

Responder 1

Date: Thu, 01 May 2025 09:57:48 +0000  
From: Martin Plaut  
To: PlanningPolicy  
Subject: Height Kentish Town Regis Road

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[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden planners

I am concerned that the height restrictions on Regis Road are worded so vaguely as to exercise no real restrictions. As your document says the area "may be appropriate" for tall buildings of 12m-52m. This is acceptable. However it then continues: "Additional height, above the potential appropriate height range, may be possible in some locations on this site...". This leaves the height range essentially unlimited which cannot be acceptable.

Regards  
Martin Plaut  
[redacted address] [redacted postcode]

21 June 2025

Dear Camden Council

I would like to support the proposal for a Camden Nature Corridor to be included under the category of 'priority infrastructure' in the Camden Local Plan, with guidance that the future development of Murphy's Yard, Regis Road and West Kentish Town Estate should support its delivery.

I refer to Policy C1 paragraph 19 for Central Camden and Policy N1 for North Camden.

It is clear that supporting nature in London is vital, both for our survival and for maintaining the area as a pleasant place for us all to live in. Nature is essential, not a luxury.

Martin Plaut

Responder 2

Date: Sun, 04 May 2025 12:07:14 +0000

From: Elizabeth Bloor

To: PlanningPolicy

Subject: FORM about your crazy policy

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## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s). Please use a separate page for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="MS"/>	<input type="text"/>
First Name	<input type="text" value="Elizabeth"/>	<input type="text"/>
Last Name	<input type="text" value="Bloor"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value=""/>	<input type="text"/>
Address Line 2	<input type="text" value=""/>	<input type="text"/>
Post Town*	<input type="text" value=""/>	<input type="text"/>
Post Code*	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation:

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="NO"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="NO"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="NO"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="YES"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text" value="YES"/>
(4) Consistent with national policy	<input type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Camden DOES NOT NEED MORE HOMES. IT is crazy to build these fictious people who are mainly wealthy outsiders or poor migrants. You have built a tower block opposite me, supposed to have consultation, 2013 when we didn't and then you built it. Your plans for Murphey yard are out ragedous. Whatever the local people say you ride rough shode over us, build what you like to make money. STOP building houses. There are loads of council houses NOT even lived in.

.I know of one on Chetwynd Road that has been vacant for 3 years. !!!!  
Camden council is a joke. Back handers from developers and this crazy  
idea that there will be more houses needed. You and the Mayor have  
ruined London. NO TREES are planted. You have killed the trees on  
Burghley Road. Everything is for rich people yet pretending you are doing  
this for local people.  
I despise your plans. Make parks for people not these crazy dogs and  
cyclists we have to deal with.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.  
You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.  
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

YES

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

What is the point in participating in anything in Camden. Planners never listen. The tower block in front of me is testament to this.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	NO
(b) when the Inspector's Report is published	NO
(c) when the Camden Local Plan is adopted	NO

**Privacy Notice**

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

<b>11. Signature:</b>	<b>Elizabeth Bloor</b>	<b>Date:</b>	<b>04/05/25</b>
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# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Just cannot believe that you lot with the permission of that dreadful planning department in Camden actually suggest covering the area with asphalt to make a padel court ??? whatever that is. Doesn't the last few days of heat wave teach you people anything? The WHOLE of Murphy's yard should be planted with trees and foliage and make it an extension of the Heath. BUT of course that won't make money for you. Thank god for the Victorians, at least they had insight to plant trees all over the place. NOT pollard them to extinction and build monstrous tower blocks everywhere there is a spare piece of land.  
Do something for once for the environment. KEEP THE WHOLE AREA GREEN

Elizabeth Bloor

Responder 3

Date: Tue, 06 May 2025 19:17:15 +0000  
From: Richard Cotton (Councillor)  
To: PlanningPolicy  
Subject: DRAFT NEW LOCAL PLAN

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I am reading through the draft new local plan and I may wish to comment further in due course.

In the meantime, I wish to comment on Policy C1, paragraph O Infrastructure.

Numbered Item 1 in paragraph O states “the delivery of step-free access at Kentish Town Underground and Thameslink Stations; Camden Town Underground Station; and Chalk Farm Underground Station”. Numbered paragraph 2 states “capacity upgrades at Camden Town Underground Station”. Those two improvements will not happen whilst TfL continues to delay the promised rebuilding of the tube station.

Numbered paragraph 3 reads “the upgrade of the north London Line. To re-instate four tracks and deliver a third platform at Camden Road overground station from 2030, to meet future passenger and freight demand”.

Numbered paragraph 4 reads “the Camden Highline, an elevated walkway between Camden Town and King’s Cross”. Surely these two objectives contradict one another. It is surely impossible to support the Camden Highline whilst re-instating four tracks and a third platform at Camden Road station.

Kind regards,

(Cllr) Richard Cotton

Councillor for Camden Town ward

[REDACTED]

Advice Surgeries (Shared with Cllr Pat Callaghan)

1<sup>st</sup> Friday of each month from 6 pm at Castlehaven Community Centre, [redacted address], [redacted postcode]

3<sup>rd</sup> Friday of each month from 6 pm at The Pirate Castle, [redacted address], [redacted postcode]

No appointment necessary

*We are all faiths and none; We are many, we are One.*

Responder 4

Date: Wed, 07 May 2025 10:45:14 +0000  
From: Kate Tract  
To: PlanningPolicy  
Subject: Draft Camden Plan comments from TRACT

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Policy 1 Central Camden P108

Infrastructure O.

To support the delivery of development in this area the Council will seek the provision of, and contributions to, the delivery of infrastructure from **appropriate development**. The Council will work with relevant providers to secure the infrastructure needed to support development and provide the facilities needed for the area's communities. **Key priorities** for the central area of the borough include:

1. the delivery of step-free access at Kentish Town Underground and Thameslink Stations; Camden Town Underground Station; and Chalk Farm Underground Station; **TRACT comment: Camden Town Station is not programmed for improvement works at this time**

2. capacity upgrades at Camden Town Underground Station; **TRACT comment: Camden Town Station is not programmed for improvement works at this time and is unlikely to be in the next 10 years.**

3. the upgrade of the north London Line, to reinstate four tracks and deliver a third platform at Camden Road overground station from 2030, to meet future passenger and freight demand; **TRACT comment: This would be welcomed but appears to be in conflict with item 4 below?**

4. the Camden Highline, an elevated walkway between Camden Town and King's Cross; **TRACT comment: This is neither an appropriate development nor should it be a key priority. It offers very poor value for money and is not needed. In addition, the Council have yet to resolve legal issues around the use of Camden Gardens (a protected square) as a location to build an entrance nor is there availability of the proposed second entrance from Royal College Street. The Councils approach to consultation on this issue has woeful and forced residents to spend a large sum on legal advice and an acoustic survey. At this time, we have not received a proper and full response to this legal advice.**

**A huge amount of public (and private) money has already been wasted on this vanity project. No more money should be put towards promoting this until all legal issues have been addressed and value for money assessment made.**

Regards Kate Gemmell  
Voluntary chair TRACT

Responder 5 and 19

Date: Tue, 13 May 2025 08:23:07 +0000  
From: Andrew Dow  
To: PlanningPolicy  
Subject: Camden Nature Corridor - Draft New Camden Local Plan

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Please register this email and my details as being in favour of the Camden Nature Corridor and it's promotion and proliferation.

It is vital that people living in Camden be given as much opportunity as possible to engage with nature, and for the plants which create the oxygen which we breathe to be allowed to flourish.

Thanks,

Yours Sincerely,

Andrew Dow

[redacted postcode]

*Andrew Dow*

[redacted]

**[redacted email]**

Dear Camden Council,

I am a Camden resident, Council Tax payer and resident in one of the affected areas of this proposal.

I am writing to support your proposal for a Camden Nature Corridor in the draft Local Plan. We urgently need to restore nature in our Borough and to bring more nature into our neighbourhoods, to address climate change, support bio-diversity and improve well-being.

New housing proposals create a unique opportunity to do this by improving nature in Camden Sites of Interest for Nature Conservation and connecting them through new developments. Therefore, I strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

Yours Sincerely,

Andrew Dow

Responder 6

Date: Fri, 16 May 2025 09:14:00 +0000

From: SM-NE-Consultations (NE)

To: PlanningPolicy

Subject: FAO Planning Policy Team Local Plan - draft Submission Version

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Your Ref: Local Plan - draft Submission Version

Our Ref: 511333

Dear Sir or Madam

Thank you for your consultation request dated and received by Natural

England on 1<sup>st</sup> May 2025.

Please find attached Natural England's response letter to your consultation request.

If you have any queries, please contact [\[redacted email\]](#)

Yours faithfully

Sharon Jenkins

Assistant Officer

Natural England

Consultation Service

[redacted  
postcode]

**Email:** [\[redacted email\]](#)

**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

Date: 16<sup>th</sup> May 2025  
Our ref: 511333  
Your ref: Local Plan – draft Submission Version



Planning Policy  
Camden Council  
Camden Town Hall  
Judd Street  
London WC1H 8EQ



**BY EMAIL ONLY** - [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Sir or Madam

**Local Plan – draft Submission Version**

Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 1st May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on your consultation request for the draft Submission Local Plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours faithfully

Sharon Jenkins  
Operations Delivery  
Consultations Team  
Natural England

Date: Tue, 20 May 2025 08:15:19 +0000  
From: Nicola Tulley  
To: Rebecca Burden, PlanningPolicy  
Subject: FW: FAO Ms Nicola Tulley REF: Camden Local Plan - Sustainability Appraisal (SA)

---

Our Ref: 511594  
Your Ref: Local Plan - SA Screening  
Dear Ms Tulley

Thank you for your consultation request, dated and received by Natural England on 2<sup>nd</sup> May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Natural England has no significant comments to make on the Sustainability Appraisal (SA) for the Local Plan.**

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely  
Sharon Jenkins  
Assistant Officer  
Natural England  
Consultation Service

**Email:** [\[redacted email\]](#)  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

This message has been sent using TLS 1.2

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: Tue, 20 May 2025 08:15:48 +0000  
From: Nicola Tulley  
To: Rebecca Burden, PlanningPolicy  
Subject: FW: FAO Ms Nicola Tulley REF: Camden Local Plan Habitats Regulations Assessment (HRA)

---

Our Ref: 511590

Your Ref: Local Plan - HRA Screening

Dear Ms Tulley

Thank you for your consultation request, dated and received by Natural England on 2<sup>nd</sup> May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Natural England has no significant comments to make on the Habitats Regulations Assessment (HRA) for the Local Plan.**

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Sharon Jenkins

Assistant Officer

Natural England

Consultation Service

**Email:** [\[redacted email\]](#)

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

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## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

**The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:**

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Nissim"/>	<input type="text" value="Shane"/>
Last Name	<input type="text" value="Hassan"/>	<input type="text" value="McCamley"/>
Job Title (where relevant)	<input type="text" value="Director"/>	<input type="text" value="Architect"/>
Organisation (where relevant)	<input type="text" value="Kilburn Solutions Ltd&lt;br/&gt;(Part of the Weis Group)"/>	<input type="text" value="McCamley Architects Ltd"/>
Address Line 1*	<input type="text"/>	<input type="text" value="██████████"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text" value="██████████"/>
██████████	<input type="text"/>	<input type="text" value="██████████"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
E-mail Address	<input type="text" value="██████████"/>	<input type="text" value="██████████"/>

**Part B – Please use a separate page for each representation**

<b>Name or Organisation:</b>
------------------------------

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	Sections 7.106 and 4.99 of the Sustainability Appraisal	Policy		Policies Map	
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input checked="" type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

<p>Our comments relate to statements made in the Sustainability Appraisal, which is a supporting document to the Local Plan.</p> <p>Firstly, Section 7.106 lists the site and says, '<b>West End Lane is Locally Listed.</b>'...After enquiring, it turns out that it is just another building on West End Lane that is Locally Listed. Could this sentence therefore be revised so that is more legible? As it currently it's unclear, and can be read as West End Lane itself, or our site, being Locally Listed.</p>
---

Secondly, Section 4.99 says, '**Given the location of this site and the need to ensure an on-going retail presence, there is little or no potential to deliver additional development here.**'

This is the sentence that we are most grieved about. We believe that as only an initial design feasibility has been produced, it is simply too early in the design process to make such a definitive statement. Therefore, we don't believe that this statement is 'sound', nor that the site has been thoroughly interrogated enough to be able to robustly justify this position.

This statement has the potential to negatively affect the decision-making process on any future planning application. As well as affect the potential for this site to come forward in the future to deliver residential units.

We feel that when looking at the site in greater depth, there may be potential for increasing this number; and produce a scheme that is appropriate for the context; and acceptable to all.

Especially as the site is not a straightforward site at all. It has a supermarket at ground level, with currently two empty levels above, (which I understand were not included in the council's total quantum of units); and then a former office building to the rear.

All we ask is that this statement is removed, and be given a level playing field, at this early stage...So that it is up to us to justify a future scheme, without this impediment.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

As mentioned above, we would like the text in Section 7.106 to be revised to be clearer and more understandable to the layman.

And for the sentence above in section 4.99 to be removed, as we don't believe it can be robustly justified, nor 'sound.'

(Continue on a separate sheet if necessary)

---

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

**Privacy Notice**

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

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**11. Signature:**



**Date:**

20.05.25

# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Planning Department  
London Borough of Camden  
2<sup>nd</sup> Floor  
5 Pancras Square  
c/o Town Hall  
Judd Street  
London WC1H 9JE

Date: 7<sup>th</sup> March 2024  
Our reference: N/A

Sent by E-mail: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Sir / Madam

## Draft New Camden Local Plan – Regulation 18 Consultation Version – January 2024 Representations on behalf of the Metropolitan Police Service

Knight Frank (KF) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above Local Plan consultation. This representation relates to two issues:-

- The Site Allocation for Kentish Town Police Station.
- Section 106 contributions to mitigate impact of crime associated with new developments.

We note that MPS made representations to previous consultations in relation to the matters raised. The last response was in January 2023. These representations raise the same issues again, but these are supplemented by new points arising from the content of the current draft plan.

### Kentish Town Police Station

Kentish Town Police Station is allocated within the draft Local Plan as 'Site Allocation C4 (KT4) – Kentish Town Police Station'. MPS have a number of concerns and objections regarding the proposed allocation, which are set out below under relevant headings.

#### **Extent of the Site**

The Kentish Town Police Station site comprises of the following elements:

- Number 10A Holmes Road (The Section House) an eight storey building to the east of the site;
- Number 12A Holmes Road (The Station House): a three storey police station, with basement. Grade II Listed;
- No 14 Holmes Road (The Annexe): a three storey pitched roof building attached to the main police station to the west side.

The site boundaries are shown at Figure 1 below. The Local Plan draft allocation shows a different boundary, which needs adjusting.

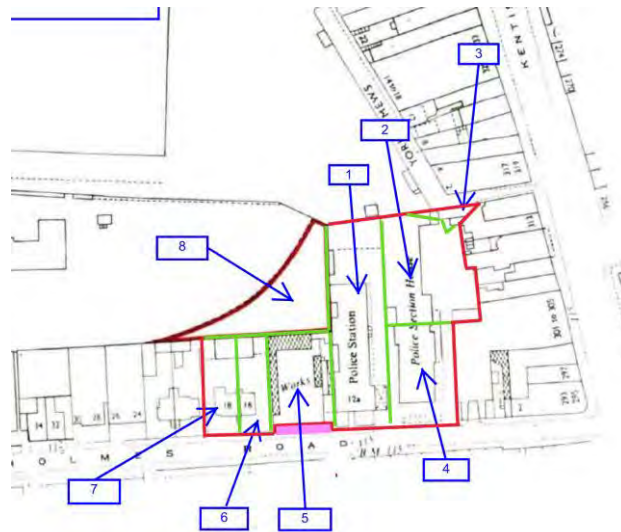


Figure 1: Extent of MOPAC Ownership at Kentish Town Police Station

### The Need for Investment in Policing

Kentish Town Police Station is not within the Regis Road Growth Area, but adjoins it. Within the Regis Road Growth Area, the Council proposes the delivery of 1,000 additional homes, as part of a wider mixed use development. Draft Policy H1 (Maximising Housing Supply), states that the Council will seek to deliver 11,550 additional homes in the Plan period to 2041. This will place significantly increased requirements on policing within the area and borough. Kentish Town Police Station plays a critical role in serving the Camden Borough. In this context, planning policies should focus on improvements to policing as essential community infrastructure supporting the proposed growth. Instead, the approach taken within the draft plan is to place other priorities over investment in policing and reduce the essential ground floor space for policing. The plan should be revised in order to address this and ensure that policing is a priority in order to support sustainable communities.

### Work Undertaken to Deliver Redevelopment of the Site

MPS appointed a contractor and consultant team to work up proposals and submit a planning application in early September 2022. The team work intensively until late August 2023. During this time, extensive discussions were undertaken with LB Camden, including:

- 3 formal pre-application meetings.
- 5 other meetings.
- A Design Review Panel meeting.

In August 2023, the contractor was stood down because MPS concluded that the proposals could not meet all of the town planning requirements for the site. In particular, losing part of the police station site to deliver a footpath / cycle link and retaining the Section House would lead to a loss of critical ground floor policing space and prevent any proposals delivering policing requirements for the site. The proposed policy context appears likely to prevent any meaningful or positive re-development of the site.

### Proposed Pedestrian / Cycle Link

The draft policy states that part (c) that:

*“Development must: ... be designed to address both Holmes Road and Regis Road and take the opportunity to provide safe and attractive pedestrian and cycle route between them, improving connections with surrounding communities...”*

We understand pursuant to this and the meetings held with LB Camden that the Council is seeking a pedestrian / cycle link between Holmes Road and Regis Road, over MOPAC owned land. LB Camden have stated that this must pass through the

existing police station yard (to the west of the site), which is used for parking police vehicles and other critical policing functions. The yard is essential to the operation of the police station and cannot readily be reduced in size or re-provided on another part of the site. MPS has offered to deliver the pedestrian / cycle route via the east side of the Section House, but this has been rejected by LB Camden.

The police station yard and ground floor space generally is a critical part of the police station and losing part of it would result in the police station no longer meeting operational requirements, as it would have insufficient parking for essential operational police vehicles. It is also important to note that the police station requires a secure boundary, so members of the public could not walk or cycle through the site unless part of it was lost from policing use. All of the land is used at present for essential policing functions.

The MPS project team worked extensively on various permutations of a potential footpath / cycle link, but were unable to find a design that would meet LB Camden's planning requirements whilst also allowing the MPS operational requirements to be met and being within the project budget.

MPS believes that delivering a footpath / cycle link to the west of the police station site is not in the interests of good urban design, for the following reasons:

- It would be on a steep incline. There is a circa 2m height difference from the north to south side of the link sought by the Council, which would exceed the standards normally applied to such a path.
- To comply with best practice design guidelines for maximum gradients for such paths, the route would require 12 large steps, making cycling impossible.
- It would have tall walls and / or security fences on either side, for security reasons. This would create a canyon link effect.
- The route would have little or no natural surveillance and would have the potential to attract crime and anti-social behaviour.
- The Designing Out Crime Officer has raised concerns about such a proposed route for these reasons. The proposed route would be contrary to the principles of Designing Out Crime.
- The route is likely to require retaining walls and be costly to deliver.

The visualisations at Figures 2 and 3 below illustrates some of the issues referred to above and has been presented to the Council during pre-application meetings. Figure 3 below shows how a route via the Section House could be preferable in design terms, delivering natural surveillance and having space for a higher quality link, without tall walls and fences.



Figure 2: Visualisation of a footpath / cycle link to the west of the Kentish Town Police Station site



Figure 3: Plan of a footpath / cycle link to the west of the Kentish Town Police Station site, showing the steps needed



Figure 4: View of a footpath / cycle link delivered via the Section House

A proposed footpath / cycle route via the Section House would also be advantageous because it would allow a connection to the High Street via York Mews. This is a connection shown in the Kentish Town Planning Framework as being desirable to deliver. A route to the west of the police station site would not achieve this.

We also note that there are other opportunities to deliver north to south pedestrian cycle links between Regis Road and Holmes Road. In particular, there is an opportunity at the western end of Holmes Road, adjoining the Unit Students – Mary Brancker building. Requiring the footpath / cycle link through a police station when such alternatives exist makes little sense, particularly when this would lead to the loss of critical policing land, required for operational policing.

The requested pedestrian / cycle link is one of the biggest challenges to any project for redevelopment of the site. Work to date has not established a workable solution. The policy does nothing to address this or provide solutions.

### Retention of the Section House

Paragraph (b) of the draft site allocation states in relation to the Section House that:

*“Development must: .... Seek to retain the Section House building in accordance with Policy 22 (Repurposing, Refurbishment and Re-use of Existing Buildings)”.*

The MPS design team undertook extensive design work to consider how the draft proposed allocation might be delivered. This has shown that there is insufficient ground floor space at the site to accommodate all the required uses, whilst also introducing a footpath / cycle link and retaining the Section House.

One potential solution worked up by the MPS project team involved shifting some of the ground floor operational uses to a new building on the site of the Section House, in order to free up space for the requested footpath / cycle link. The draft policy requires retention of the Section House, thereby preventing any such solution being delivered. This illustrates how too many competing requirements are preventing development of the site being delivered.

We note that there are already other policies in the draft plan regarding the Council's aim to re-use existing buildings where possible. Given that this is the case and given the significant challenges with retaining the Section House, MPS proposes that reference to retaining the Section House should be removed from the draft proposed policy.

### **Summary and Requested Changes to the Policy**

In summary, MPS's comments on the draft site allocation for Kentish Town Police Station raise the following points:

- The proposed allocation would lead to a loss of essential ground floor policing space as a result of the proposed footpath / cycle link, which will be detrimental to policing in the borough.
- Significant proposed housing growth both at Regis Road and in the Borough as a whole require investment in policing as essential supporting community infrastructure.
- The policy as drafted does not prioritise policing provision and seeks to reduce critical ground floor policing space.
- It is not possible to deliver a development which includes both the proposed footpath / cycle link and retains the Section House.
- A footpath / cycle link via the west side of the police station site would be contrary to the principles of Designing Out Crime, would exceed standards for gradient changes and would be too steep to allow any cycling.
- A footpath / cycle link to the east of the Section House or further west on Holmes Road can be delivered and would have many benefits, including being more permeable to the High Street, being compliant with the principles of Designing Out Crime, providing a more attractive environment and avoiding a steep slope which prevents cycling.

Given these points, MPS requests that the draft allocation removes reference to retention of the Section House and makes clear that any proposed footpath / cycle link would not be delivered to the west of the police station, but elsewhere on Holmes Road (we have suggested more realistic and deliverable alternatives). This is considered essential to make the proposed draft allocation deliverable.

## Section 106 Contributions

### **Background**

Policy H1 (Maximising Housing Supply), states that the Council will seek to deliver 11,550 additional homes in the Plan period to 2041. There would also be similar corresponding growth in office and retail floorspace.

The growth in homes, offices and other uses will significantly increase the need for policing and the cost for associated infrastructure. This therefore represents a legitimate infrastructure requirement that should be accounted for.

Appendix 1 of the draft Local Plan comprises an Infrastructure Schedule. This makes not reference to emergency services or policing. This seems a surprising omission for an Infrastructure Schedule.

### **Policy Recognition Sought**

MPS is seeking recognition within the forthcoming Local Plan and supporting documents that new dwellings and other development increases the need for policing, leading to a legitimate infrastructure requirement that should be accounted for through section 106 contributions. We believe that it is appropriate that this should be set out clearly within the Local Plan, as opposed to any other documents. This is because this document establishes the need for and strategy to deliver new dwellings and other growth that gives rise to the requirement.

Previous representations were submitted in this regard in 2019 and 2020, but the changes have yet to be incorporated into the plan and associated documents. There has however been acceptance through the planning application process of such financial contributions within LB Camden.

MPS have examples of suitable text included in Local Plan and supporting documents by other Local Authorities, which can be provided if helpful.

### **Relevant Appeal and Court Cases**

It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within a Section 106 agreement. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and the Police National Database. A breakdown of non-building related infrastructure sought by MPS is detailed below.

For example, in the case of *The Queen (on the application of The Police and Crime Commissioner for Leicestershire) v Blaby District Council* [2014] EWHC 1719 (Admin), Judge Foskett stated:

*61... "I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the "consumer view" of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that in itself can be a difficult objective to achieve in these financially difficult times. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police.*

*62. I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area."*

The above conclusions echo those reached in an earlier appeal case of *Land off Melton Road, Barrow-upon-Soar* (APP/X2410/A/12/2173673), in which the Secretary of State endorsed the following findings of the Inspector:

*291... "the twelfth core planning principle of the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, "safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.*

There are other more recent appeal and court precedents with the most recent being in 2021. Full details of these can be made available upon request.

### **Nature of Contributions Sought**

MPS have prepared a charging formula, based on the approach used by other Police and Crime Commissioners and tested through the above appeals and court cases. This seeks contributions towards the following categories of policing infrastructure in connection with new major developments (generally only those referable to the Mayor for London).

- Staff set up costs
  - Uniforms.
  - Radios.
  - Workstation/Office equipment.
  - Training.
- Vehicles
  - Patrol vehicles.
  - Police community support officers (PCSO) vehicles.
  - Bicycles.
- Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.
- CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.
- Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.

- The provision of police office accommodation.

MPS has been successful in securing financial contributions on a number of similar developments within London based on this tried and tested formula. This demonstrates that the request is considered to be reasonable and compliant with the CIL Regulations by other London based Local Authorities.

#### **Changes Requested**

MPS requests that the Local Plan makes clear, including within the Infrastructure Schedule, that MPS requires section 106 funding from residential developments where they are referable to the Mayor for London.

#### **Summary**

These representations set out comments in relation to the proposed site allocation for Kentish Town Police Station and in relation to section 106 contributions. The representations re-state and supplement comments made to previous Local Plan consultations. The representations set out important changes to the draft plan, which will be required if the Local Plan is to support investment in policing infrastructure to facilitate residential and commercial growth proposed within the borough within the plan period.

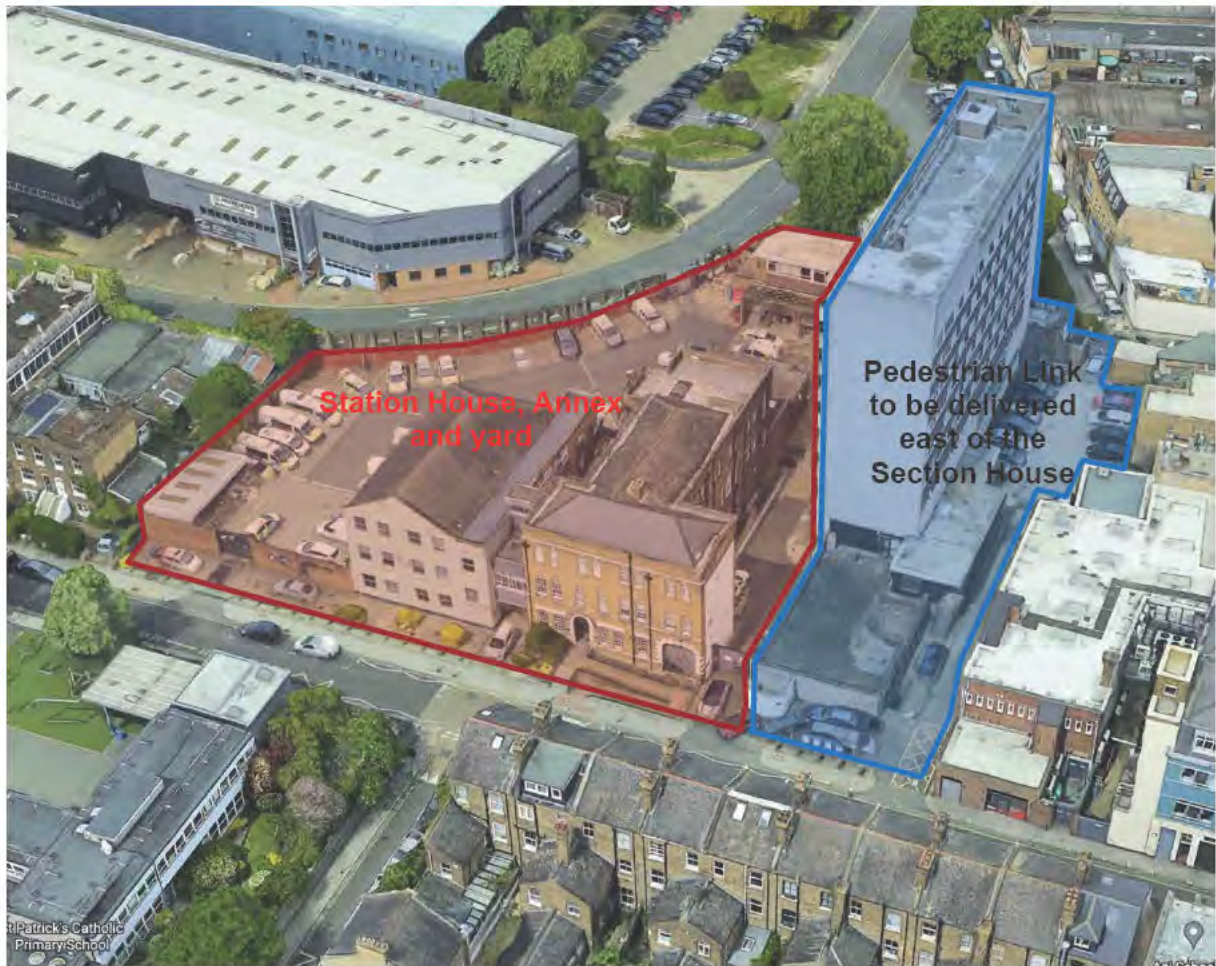
Yours sincerely

[Redacted Signature]

**Vincent Gabbe**  
Consultant

[Redacted Contact Information]

## Appendix 1 – Annotated Photo of Kentish Town Police Station



# Infrastructure Delivery Plan (IDP)

Service Area: **Community Safety**

Name of Officer/ Respondent: Vincent Gabbe, Knight Frank

Job Title: Consultant

(If the question is not relevant please put n/a. If you're not sure of any question/ answer please say so in your response. Thank you).

- How is Community Safety funded at present?

The Metropolitan Police Service (MPS) receive government grant funding from the Greater London Authority (GLA) and central government, though this is not enough to fund police resourcing and developer contributions are therefore also sought in connection with larger developments.

- What is the role of developer contributions?

To cover the impact on policing resulting from additional homes and employment to the area as this significantly increases the need for policing and the cost for associated infrastructure.

- If there are developer contributions, how much has been allocated per annum for the last 5 years?

The MPS have not received any money from developer contributions in the last five years within LB Camden.

- Are there any relevant service strategies or evidence relating to infrastructure need at LB Camden/Borough level? If so, please list and summarise key messages:

The draft Local Plan (Regulation 18) states a target to deliver 770 new homes per year, with housing delivery stated to be a priority in delivering a sufficient supply of homes in the borough over the plan period. This increase in new homes would bring significant growth in employment to the area over the plan period, and the growth in homes, offices and other uses will increase the need for policing and the cost of associated infrastructure. This therefore represents a legitimate requirement that should be accounted for.

- Have any representations been made by service providers that the existing approach to developer contributions needs to be changed? If so, please summarise comments:

Please see attached representations made toward the Regulation 18 Local Plan.

- The Infrastructure schedule/ Appendix 1 can be found in the [draft new Local Plan](#): is this up-to-date? If not, please advise of any required amendments:

The draft Local Plan does not make reference to the need for section 106 contributions towards policing infrastructure. As outlined in the representations submitted by the MPS, this should be updated to make clear the MPS require developer contributions from residential developments where they are referable to the Mayor of London.

- Any comments on the points above?

Developer contributions were requested for the Camden Highline planning application (Ref: 2022/2019/P). This contribution was rejected by councillors at planning committee, despite being proposed by officers.

## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	Metropolitan Police Service	Knight Frank LLP
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/> Address	<input type="text"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

<b>Name or Organisation:</b>
------------------------------

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph		Policy	Policy CS3 – Social and Community Use and Community Infrastructure Plan	Policies Map	
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input checked="" type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

<p>The Metropolitan Police Service have made representations to a number of different LB Camden planning consultations relating to section 106 contributions towards policing infrastructure. This includes the Regulation 18 Draft Camden Local Plan.</p>
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Requirements to contribute through section 106 towards policing infrastructure have been tested through numerous appeals and court cases and found to be compliant with the CIL Regulations. Police forces throughout the country secure section 106 funds in this way and there are also examples of such contributions being made within London.

The scale of growth envisaged in LB Camden makes it particularly important to ensure that sufficient policing infrastructure is in place for new development and communities. Directly adjoining Kentish Town Police Station is a new proposed community of 1,000 dwellings, this being one of a number within the borough.

The Council's Regulation 22(1)(c) Consultation Statement notes in response to the Metropolitan Police Service's a previous representations on this mater that "...We will ...set out the arrangements applicable to referable schemes as part of the Council's Infrastructure Delivery Plan which will incorporate an updated infrastructure table/currently Appendix 1 in the draft Local Plan". The following column states "No change proposed". The suggestion that the objections will be addressed is welcome, however, the Regulation 19 Local Plan and Camden Infrastructure Delivery Plan April 2025 do not contain the required text.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

The Infrastructure Delivery Plan should be revised at page 63, under Emergency Services and Community Safety Funding, to state:

*"The Metropolitan Police Service is primarily funded by the Home Office and the Mayor of London's Office for Policing and Crime (MPOAC). The Home Office provides a majority share of funding, with the Mayor supplementing this through a combination of contributions from City Hall, council tax and business rates. However, there is a significant funding shortfall and additional sources of funding are required to accommodate the requirements arising from new development.*

*It should be noted that the Metropolitan Police Service has developed a model for defining a proportionate level of contribution towards the policing resource generated by new development and will be likely seek contributions using this model for development proposals that are referable to the Mayor of London. Areas for use of contributions that have been identified include staff set up costs, vehicles, mobile IT, Police National Database (e.g. licences, IT and telephony) and the provision of police accommodation.*

*Applicants proposing referable schemes are encouraged to engage with the Metropolitan Police Service at the pre-application stage to help understand the amount likely to be sought through this modelling and any specific policing infrastructure that might be sought within the scheme itself."*

This proposed text is taken from the LLDC Planning Obligations SPD 2022 and similar text has also been used by other London Boroughs.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Because (i) the content of the Local Plan allocation is of key importance to continued policing from the site, (ii) previous representations have not resulted in the required changes and (iii) there is complexity to the requested changes that may result in questions from the Inspector at the Examination.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

#### Privacy Notice

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**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	27/6/25
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# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	Metropolitan Police Service	Knight Frank LLP
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/> Address	<input type="text"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation:

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	<input type="text"/>	Policy	<input type="text" value="Allocation&lt;br/&gt;C4 – Kentish&lt;br/&gt;Town Police&lt;br/&gt;Station"/>	Policies Map	<input type="text"/>
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="x"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text" value="x"/>
(4) Consistent with national policy	<input type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

The Metropolitan Police Service consider proposed site allocation to be unsound in relation to two key issues.

Firstly, Paragraph 4 of the allocation states “Development must... (4) seek to retain the Section House building ... and re-use to provide student accommodation”. This requirement is not considered to be positively prepared, justified or effective because:

1. The site is currently occupied by a police station. The building in question is actively occupied by police uses and it is highly likely that the building will continue to be required for policing uses in the future, even if the site is redeveloped.
2. This requirement was not contained in the Regulation 18 Draft Local Plan or earlier consultation stages. The Council has not discussed this proposal with MOPAC / The Metropolitan Police Service as the site owner and a key emergency service provider for the borough.
3. For the reasons set out above, requiring student housing within the Section House could compromise delivery of both updated and modernised policing facilities and the Regis Road masterplan.

The second objection in relation to the allocation relates to paragraph 7. This paragraph states that "Development must... (7) seek to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities".

In relation to this issue, the Council's 'Consultation Statement' notes in response to the Metropolitan Police Service's previous objections:

*"Comment noted. The policy does not specify a route for the pedestrian and cycle link between Holmes Road and Regis Road and recognise[s] that police operational requirements should not be compromised by development".*

MPS considers that this pedestrian and cycle link requirement is not positively prepared, justified or effective because it should show sufficient flexibility to ensure that it does not act as a block to redevelopment of this key site. Previous initiatives to redevelop the site were not deliverable, due to the complexities of trying to deliver such a route whilst also accommodating the essential ground floor uses required by the police station. We therefore believe that the wording of the policy should show sufficient flexibility to ensure that it does not continue to act as a barrier to redevelopment of this key site and delivery of much needed modern policing facilities.

These representations have been discussed with Yoo Capital and their advisors, who are working closely with the Metropolitan Police Service.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Site allocation C4 should be re-worded as follows:

"Development must... (4) seek to retain the Section House building in accordance with Policy CC2 (Retention of Existing Buildings). The building is not currently proposed for a use other than policing, but in the event that it does become surplus to policing requirements, proposals should consider-and re-use to provide student accommodation". Where student housing is proposed this should be in accordance with Police H9 (Purpose-built Student Accommodation);

"Development must... (7) as far as reasonably possible without compromising policing functions required by the site, seek to provide a safe and attractive walking, wheeling and cycling route between Holmes Road and Regis Road to improve connections with surrounding communities".

It is currently envisaged that this would be delivered across the yard area to the west of the site, given policing functions would be focussed on the east / Section House side of the site.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Because (i) the content of the Local Plan allocation is of key importance to continued policing from the site, (ii) previous representations have not resulted in the required changes and (iii) there is complexity to the requested changes that may result in questions from the Inspector at the Examination.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

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**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

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<b>11. Signature:</b>		<b>Date:</b>	27/6/25
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# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Police Constable"/>	<input type="text"/>
First Name	<input type="text" value="Aran"/>	<input type="text"/>
Last Name	<input type="text" value="Johnston"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Design Out Crime Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="MPS"/>	<input type="text"/>
Address Line 1*	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Post Town*	<input type="text" value="██████"/>	<input type="text"/>
██████████	<input type="text" value="██████████"/>	<input type="text"/>
██████████████████	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████████████"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

**Name or Organisation:** Metropolitan Police Service; Secured by Design (SBD) on behalf of Police Crime Prevention Initiatives (PCPI)

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text" value="Y"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="N"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="N"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text" value="Y"/>
(4) Consistent with national policy	<input type="text" value="N"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

What the local plan within this paragraph and policy (*Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage*) stipulates is open to interpretation and unfortunately value engineering can occur. Value engineering is the systematic approach focussed on optimising the functionality and cost effectiveness of a product, project or business. This can take the form of omitting security rated products in lieu of a cheaper and ultimately inferior product which can severely compromise the security of a building or development as a whole. Where the developer can provide a design using the principles of secured by design. Consultation with the local design out crime officer is essential. The free design guides that are available on the SBD website are national and some of the lower end or entry

level security ratings would not be suited to an inner city environment where the crime level is above the national average.

It is often the case that a developer will look at achieving a BREEAM award where security is far from the main focus. To satisfy the security component of BREEAM a security needs assessment (SNA) is often conducted and is usually paid for by the applicant. In this instance the person taking on the BREEAM report only needs to attempt contact with the DOCO to satisfy this element. This can mean that local knowledge and crime prevention advice can be absent from consideration during the design and build phases. Having a condition for developments to achieve an SBD award to a minimum of Silver (unless refurbishment or an area where conservation issues exist and Bronze is the potential award) is far more comprehensive and can be taken alongside a BREEAM assessment if the client or applicant so wishes. A development that has been signed off for a SBD silver or gold award would satisfy any BREEAM requirement.

Too often crime and its prevention and mitigation are either not featured within an applications design and access statement or it is a footnote. Sometimes it is only a short meeting with the applicant at pre-application stage that will be the only potential influence over design. If the developer/applicant does not have a condition to be met then there is little else to ensure that the recommendations have been adhered to. Approved documents do not go far enough in terms of security to mitigate the potential crime risk faced by inner London boroughs such as Camden.

Recent government budgets has meant a deficit in police funding. There will be no increase in police numbers within the MPS. With increase in developments and population police demand is set to increase. Having infrastructure that has been conditioned to achieve secured by design can lead to a reduction in calls for service. There are other London boroughs which have included SBD conditions within the local plan.

The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards. Note 1.5: Research documentation can be found on the SBD website at: <https://www.securedbydesign.com>

Please see the attached word document for other areas of the local plan where a planning condition for developments to achieve SBD (rather than consider the principles) would be of benefit.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

The concern raised in the section above can be greatly assisted with the conditioning of developments to achieve an SBD award at planning. If the wording of the local plan is not open to interpretation the result will be safer buildings and developments. This will have a positive effect on resident's wellbeing and general health as well as result in less demand for police resources.

A suitable wording for the condition would be such as the example below:

**I recommend that the following conditions be placed upon this application.**

- 1. Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning office.**
- 2. For the site to achieve a secured by design accreditation to minimum of silver award and to maintain this standard through the life of the development.**

Or

**To help to enhance community safety through the implementation of proven crime prevention products and measures (addressed by SBD), I would respectfully request that any approval of this application contains a relevant planning condition 'whereby the development must achieve SBD accreditation, prior to occupation'. SBD guidance is available via [www.securedbydesign.com](http://www.securedbydesign.com) and via an MPS Designing Out Crime Officer (DOCO).**

Or (example used by Westminster)

- **CONDITION:** Prior to any above-ground works, details of full 'Secured by Design' Accreditation shall be submitted and approved in writing by the Local Planning Authority. The details shall demonstrate consultation with the Metropolitan Police Designing Out Crime Officers and that each building or such part of a building can achieve accreditation. The development shall only be carried out in accordance with the approved details and maintained thereafter.
- **CONDITION:** Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Although it may not be required I would be happy to field any questions regarding secured by design (SBD) and crime prevention through environmental design (CPTED). There are often concerns and sometimes a lack of understanding of DOCO work and how it can be of benefit. We work closely with developers/applicants/architects and planning officers to ensure a design that is safe, secure and appealing.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following?  
Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Y
(b) when the Inspector's Report is published	Y
(c) when the Camden Local Plan is adopted	Y

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<b>11. Signature:</b>		<b>Date:</b>	<b>27/06/2025</b>
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# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Areas that can be improved through an SBD condition on the development

7.288 The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime, in accordance with Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. All management arrangements related to safety and security should be included within the management plan(s) for the development, secured as a planning obligation.

P. 279 Policy H9 Chapter 7 Meeting Housing Needs

7.333 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life. All housing with shared facilities should be designed to minimise risk to health and safety, be practical, and support adaptability and accessibility. Proposals should take account of Policy D1 (Achieving Design Excellence), Policy D3 (Design of Housing), and Policy A2 (Safety and Security). Applicants should consider the Secured by Design principles and guides, and should discuss any scheme with Police Designing Out Crime Officers at the pre application stage. The Council may seek incorporation of measures related to safety and security as part of a management plan secured by a planning obligation.

p. 289 Policy H9 Chapter 7 Meeting Housing Needs

10.7 Ensuring that developments are designed to reduce crime and the fear of crime, and improve community safety (Policy A2 (Safety and Security))

P. 392 Chapter 10 Improving Health and Wellbeing

10.39 Social and community infrastructure can help to enhance quality of life and social cohesion, improve personal health and well-being, reduce social isolation, instil a sense of community identity and belonging, and help reduce crime and anti-social behaviour.

P. 399 Chapter 10 Supporting Camden's Communities

11.19 We will also work with partners to enhance the Canal and balance the differing demands on the Canal and its towpath. Key considerations here are improving the accessibility of the Canal and also improving biodiversity along the Canal through planting and the provision of green or brown roofs and green walls. Other issues relevant to development proposals in proximity of the Canal include the increasing demands on the towpath by pedestrians and cyclists, the potential for crime and anti-social behaviour due to the Canal's relative isolation, and the importance of retaining dark, unlit land in sustaining habitats and species, particularly the foraging of bats.

P. 428 The Natural Environment

Policy D1

10. be safe and secure, and designed to minimise crime and antisocial behaviour, incorporating ground floor uses that create interest and activity and ensure that public spaces are highly visible in accordance with Policy A2 (Safety and Security)

P. 447 Chapter 12 Design and Heritage Policy D1 Achieving Design Excellence

Shop windows

12.168 Lighting from shop windows can help to increase security after dark. The Council may therefore seek the maintenance of some shopfront lighting overnight, where appropriate, particularly in areas identified as having high levels of crime. However, this lighting should be well designed, so it does not cause light pollution.

P. 492 Chapter 12 Design and Heritage

Safety and security 13.36 Crime and the fear of crime can undermine people's quality of life, health and well-being. Planning can play an important role in reducing crime and helping to create safe, strong and open communities.

Chapter 13 Protecting Amenity Safety and Security

To create a safer borough for all, the Council will require development to: 1. incorporate design, layout, and access measures to contribute to community safety and security, particularly in wards with relatively high levels of crime; 2. give consideration to designing out crime and anti-social behaviour at an early stage in the planning process. Major planning applications must be accompanied by a Crime Impact Assessment, which should demonstrate that any impact on crime and antisocial behaviour has been considered, addressed and, where appropriate, designed out; 3. be designed to include the following measures, where appropriate:

P. 501 Policy A2 Safety and Security Chapter 13 Protecting Amenity

5. address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, central London and other centres, and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design;

P. 501 Policy A2 Safety and Security Chapter 13 Protecting Amenity

Design and Security

13.40 Consideration of how crime, disorder and fear of crime can be addressed is an important element of good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment that meets the needs of Camden's diverse communities, acknowledging that different groups within the population use spaces, and perceive what is safe, differently.

P. 510 Chapter 13 Protecting Amenity Design and Security

Responder 9

Date: Tue, 10 Jun 2025 11:50:39 +0000  
From: T&G Earley  
To: PlanningPolicy  
Subject: Fwd: Camden Draft Local Plan 2025, Land Adjacent to Constable House, Objection

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Begin forwarded message:

**From:** T&G Earley <[\[redacted email\]](#)>  
**Subject:** Camden Draft Local Plan 2025, Land Adjacent to Constable House, Objection  
**Date:** 10 June 2025 at 12:45:37 BST  
**To:** [\[redacted email\]](#)

Dear Camden planning team.  
Please find my objection to the allocation of land at Constable House as a Gypsy and Travellers site (C27)  
Kind regards  
Graham Earley

# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Graham"/>	<input type="text"/>
Last Name	<input type="text" value="Earley"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Retired"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Post Town*	<input type="text" value="██████"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████████████"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation:

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="X"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="X"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text" value="X"/>
(4) Consistent with national policy	<input style="width: 50px;" type="text" value="?"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

The policy section covering the allocation of land adjacent to Constable House, Adelaide Road is not sound.

**Following the initial consultant’s study, Camden officer’s further assessment of identified sites did not identify nor give any reasoned justification for land east of Constable House to be allocated for Gypsy and Travellers in the Submission Draft Plan.**

In addition, there has been very little, if any, consultation with the residents of constable house and surrounding areas.

**Proper consultation on the identification of sites for this purpose was inadequate.**

The proposal removes valuable open space from this densely populated neighbourhood. The site is, rather dismissively, described as being a 'kick about space' when in fact it is the only space available for games and recreation for residents on the constable house property. It is now managed by the Koko foundation; they had planned to 'green' the site by planting trees and involving local youth in the process. While residents may prefer that this space was allocated for their recreation (for example a playground), at least the Koko plan helps meet the existing environmental and social goals of council policy.

The allocation of this space as a (4-5 pitch) traveller's site, effectively high-density housing, is in contradiction with existing policy on green/recreational space.

It is also based on metrics from other sites where the **council admits to a problem with overcrowding.**

Referring to Camden's list of policy constraints the below is apparent:

**Primary constraints used for excluding sites for this use have not to have been applied to this site e.g. local green space, open space, playgrounds, overlooking.**

The site is overlooked by houses on Provost Road, be the block of flats on Haverstock Hill, backing onto Provost Road and will also be overlooked by the new development on the opposite side of the Provost Road/Adelaide Road corner.

The plan is also unsound because of the limited space available. The idea the 4-5 pitches can be squeezed onto this site is mistaken. The plan refers to space for each pitch as comprising room for a residential caravan, a trailer and a (presumably large) towing capable vehicle. It also acknowledges that waste storage facilities will need to be constructed.

**This will lead to unacceptable overcrowding (see best practice guidance)**

There will also be increased pressure on local parking. It is extremely improbable that all the traveller's vehicles could be accommodated on site. It therefore contradicts the council's stated policy aim of reducing the number of vehicles on local residential roads.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above. You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

This plan is unsound, and no modification would make it so, both existing residents and the traveller community deserve better.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

It is necessary for more local people to be directly involved in such an important and consequential plan.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.*

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	
(b) when the Inspector's Report is published	
(c) when the Camden Local Plan is adopted	

#### Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:	Graham Earley	Date:	10/06/2025
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Responder 10

Date: Tue, 10 Jun 2025 12:02:32 +0000

From: POWELL, Samantha

To: PlanningPolicy

Subject: Department for Education representation to LB Camden's Reg 19 Draft  
new Local Plan

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Department  
for Education

[Redacted]

Our Ref: DfE/Local Plan/Camden

10th June 2025

Dear Sir/Madam,

**Re: London Borough of Camden Local Plan**

**Consultation under Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012**

**Submission of the Department for Education**

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. Under the current provisions of the Education Act 2011 and the Academies Act 2010, most new state schools are established as academies/'free schools' and DfE is the delivery body for some of these, rather than local authorities. Local authorities have a statutory responsibility to ensure sufficient education provision and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new education infrastructure. We have published guidance on securing developer contributions for education, and estimating pupil yield from housing development, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding Planning Practice Guidance on planning obligations, viability and safe and healthy communities.<sup>1</sup>
3. We would like to offer the following comments in response to Camden's current consultation:

**Soundness**

4. As the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan (with regard to it being positively prepared, justified, effective and consistent with national policy), the following detailed comments set out DfE's view of the plan's soundness in respect of education provision.
5. The department supports the Council's Policy SC3, Social and Community Infrastructure, which confirms at SC3A that: *'The Council will work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of Camden's communities and support the delivery of*

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<sup>1</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

services.’ and that provision of new or improved infrastructure will be supported where it meets various criteria including *‘where proposals... meet the needs of the intended users and promote community integration and inclusion’*.

6. DfE has been seeking to secure a permanent site for Abacus Belsize Primary School for 13 years. It is amongst the highest-performing primaries in the borough and has been operating from temporary classrooms since 2013.
7. Hampstead and Kilburn MP Tulip Siddiq has long campaigned for the school to be found a permanent home, through this extensive period of site searches, including planning applications and an appeal following an overturn of the officer’s recommendation to approve by Committee in relation to the Former Hampstead Police Station (LPA ref: 2019/2375/P & 2019/2491/L). She has been reported as confirming *“I will continue to do everything I can to support Abacus in its fight for a permanent home. The children, parents and staff at Abacus deserve certainty and stability, and I will keep working with them, the council, and the government until this is achieved.”* (HamHigh news, 2019).
8. Abacus Primary School temporary site is referenced on p50 of the Council’s [Infrastructure Delivery Strategy 2025](#) (IDP), under a section titled ‘Known Planned Provision’. However, there is no recognition in the document of the need for a permanent site for the school.
9. DfE has commissioned appraisals of over 122 sites and made continued efforts to engage with the Council and local landowners to find a suitable permanent home for the school. A number of LA primary schools in the borough have closed in recent years which should have been offered to the DfE, using SoS scheming powers.
10. The existing temporary provision (under a short lease from the Council to the Trust) is in very poor condition and not fit for purpose. The most recent damage in May 2025 was caused by significant water ingress following heavy rainfall which led to partial closure of the school and significant disruption during the Y6 exam period. Despite its very poor condition and long-term need for a new location for the school, neither the requirement or potential options for a permanent site are explicitly referenced within the IDP or as site allocations on the proposals map.
11. The IDP is a critical part of the evidence base which informs the emerging local plan policies and site allocations. As such, the IDP should clearly identify the need for a permanent site for Abacus Primary school.
12. There is a requirement for all Local Plans to be consistent with national policy. [Para 100 of the NPPF](#) specifically relates to education provision, and para 16(c) confirms plans should be shaped by effective engagement, including with infrastructure providers. Further, relevant [Planning Practice Guidance](#) confirms: *‘Plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries’*.
13. **DfE would therefore welcome explicit reference in the IDP to the need for a permanent home for Abacus Primary School, and site options identified on the Local Plan proposals map or listed elsewhere in the Local Plan and/or supporting documents.** Without this, DfE considers the plan to be unsound on the basis that it has not been positively prepared and does not demonstrate a justified and effective approach to education provision.

14. We also wish to correct an inaccurate statement on p44 of the IDP which refers to delivery of new schools. It currently reads: *'Following the advent of academies and free schools, local authorities in England are not permitted to develop proposals for new state schools.'* This statement is incorrect and should be amended to reflect the following: Whilst the free school presumption process is the main route by which local authorities currently establish new schools to meet the need for additional places, in limited circumstances, local authorities are able to put forward proposals to establish new maintained schools. These circumstances are set out in sections 10 and 11 of the Education and Inspection Act 2006 and in ['Opening and closing maintained schools' guidance](#).
15. The Children's Wellbeing and Schools Bill currently before Parliament will remove the presumption that all new schools should be academies. Local authorities will be able to invite proposals for academies and other types of school and decide whether to put their own proposals forward. Ahead of the Bill receiving royal assent and being implemented, however, the free school presumption remains in place.

### **Conclusion**

16. I hope the above comments are helpful in finalising Camden's Local Plan, with specific regard to positive planning for education infrastructure as set out in Policy SC3. Please notify the department when the Local Plan is submitted for examination and dates for the Examination in Public, when known, as we would like to give evidence.
17. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with Camden to develop a sound Local Plan which will aid in the delivery of high-quality education provision.

Yours faithfully,

[Redacted]

Samantha Powell  
Head of Forward Planning, DfE

[Redacted]  
[Redacted]  
[Redacted]

## Responder 11

Date: Tue, 10 Jun 2025 20:50:46 +0000  
From: Adrian Goldthorpe  
To: PlanningPolicy  
Subject: Re: Camden Plan C27

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A

On Tue, 10 Jun 2025 at 21:26, Adrian Goldthorpe <[\[redacted email\]](#)> wrote:

Please find attached the response to planning application C27

Please confirm receipt of this email

Regards  
Adrian Goldthorpe

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Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s). Please use a separate page for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Adrian"/>	<input type="text"/>
Last Name	<input type="text" value="Goldthorpe"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Post Town*	<input type="text" value="██████"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation:

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input style="width: 60px; height: 20px;" type="text"/>	No	<input style="width: 60px; height: 20px; border: 1px solid black;" type="text" value="X"/>
(2) Sound	Yes	<input style="width: 60px; height: 20px;" type="text"/>	No	<input style="width: 60px; height: 20px; border: 1px solid black;" type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 60px; height: 20px;" type="text"/>	No	<input style="width: 60px; height: 20px; border: 1px solid black;" type="text" value="X"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input style="width: 100%; height: 25px;" type="text" value="UNSOUND"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input style="width: 100%; height: 25px;" type="text" value="UNSOUND"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 100%; height: 25px;" type="text" value="UNSOUND"/>
(4) Consistent with national policy	<input style="width: 100%; height: 25px;" type="text" value="UNSOUND"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

The proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk;
- Lack of deliverability.

Specifically this is as follows:

### **1. Loss of Functional Amenity Space Used by Residents**

The site is actively used by local residents and children as informal play and communal space. There may be other garden areas across the estate but this site is directly adjacent to Constable House and is particularly accessible and visible to its residents ensuring children can play in site of parents.

It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation. This develop would be contrary to a number of requirements in both the London Plan Policy and the Camden Local Plan Policy in regards to reducing the quality and variety of local amenities.

### **2. Overlooking and Harm to Privacy - Amenity Impact**

The site is immediately and heavily overlooked by the multi-storey residential blocks of Constable House and adjacent buildings. The resulting conditions would undermine privacy for both existing residents and potential site occupants.

### **3. Flood Risk - Inappropriate for Highly Vulnerable Use**

The site lies within a Local Flood Risk Zone and traveller accommodation is considered a "highly vulnerable" use under Planning Practice Guidance.

### **4. Access and Deliverability - Physical and Functional Constraints**

There is no independent vehicular access. Estate roads cannot accommodate trailers, service, or emergency vehicles.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

An alternative site should be found as this is not an appropriate site.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Camden needs to listen to the voices of its local residents whom are council tax payers. There are additional concerns about the location in terms of safety and security on what is already a somewhat sketchy junction.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following?  
Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

#### Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	10 <sup>th</sup> June 2025
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# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Date: Wed, 11 Jun 2025 14:12:23 +0000  
From: T&G Earley  
To: PlanningPolicy  
Subject: ALLOCATION OF LAND ADJACENT TO CONSTABLE HOUSE AS A GYPSY AND TRAVELLERS SITE [C27]

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[\[redacted email\]](#)

I would like to seek modifications to this plan

**Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

References:

Chapter 4 Central Camden: Table 5 Further site allocations in Central Camden: C27 Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Chapter 7: Meeting Housing Needs: Policy H11 Accommodation for Travellers no. 2. C27 Land adjacent to Constable House, Adelaide Rd

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations C27 Land to the East of Constable House

**Suggested Reasons for the Proposed Modification**

**1. Inappropriate Use of the Site**

- This is a **highly visible site** located at the junction of Adelaide Road and Eton College Road. Adelaide Road is an important east west [bus] route between Swiss Cottage and Chalk Farm. This location will limit the privacy of its occupants.
- The site is 661 sqm held freehold by the Council. It lies within the curtilage of Constable House and currently and historically forms part of the surrounding **open space/amenity area for use by residents**. The use of the site for Gypsies and Travellers will be a serious loss to the amenity of residents of Constable House and the wider area particularly in such a dense urban location.
- **Constraints** applied in the process of site identification and selection appear not to have been applied in the case of C27 Land to the East of Constable House. Viz
- **Amenity space associated with housing estates**. Such sites are generally considered by LB Camden to be unavailable and unsuitable, because availability of and access to Council housing and private open space of Council tenants is already constrained by the dense urban nature of the borough and high land values. [Ref Gypsy and Travellers Site Identification and Selection Report November 2024 Para 2.23] There is **no independent access** to the allocated site and serious disruption is likely to be caused to residents of Constable House.
  - It is also an important **local green/open space with mature trees and wild flowers**: protected under the policies of the adopted and emerging local plan.
  - **Overlooking**: The site is overlooked on all sides by buildings over 4 storeys. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5 [redacted address] (identified as C25 in the schedule of allocated sites); and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and

busy bus route with implications re privacy for a permanent Gypsy and Travellers site.

- **Playground:** It has historically been identified on the OS Maps as a playground and serves as a 'kick-about' area. This is important due to the lack of other recreational space around Constable House. [Please refer to the concerns of the National Play Commission on the importance of physical activity for urban children as reported here: <https://www.bbc.co.uk/news/articles/c39xegx41xko>](#)
- **Flood Risk** Adelaide Road identified as 'surface water' flood risk.

**2. There has been *No Consultation on the Allocation of land to the East of Constable House as a Gypsy and Travellers site - generally or specifically with local residents/neighbours adjoining the site.***

**Summary Justification:**

- The two allocated sites were not identified until the publication of the Submission Draft Local Plan in May 2025.
- Policy H11 in the Draft Local Plan 2024 expressed an 'intention' to identify sites.
- Notice of a consultant's report (Gypsy & Travellers Site Identification Study [GTSIS] published in November 2024) was by only by a Newsletter posted on the Council's website on 24th December 2024 requiring responses by 29th January 2025. **Very few residents will have seen this Newsletter, which raises the question, "was that that the intent of the council?"** The GTSIS reported 18 sites were selected for Gypsy and Travellers for further Council officer assessment. Land to the east of Constable House was not identified.
- Further assessment of the selected 18 sites by officers in a Topic Paper published/reported in April 2025 still did not identify Land East of Constable House for a Gypsy and Travellers site.
- Not until this late stage of consultation on the Submission Draft Local Plan 2025 has it been possible to raise local concern on the matter. Again, was this the intention of the council, are you trying to move forward 'under the radar". **This is suggestive of a complete disregard for the feelings and opinions of the social housing tents and flat owners of Constable House.**

**Conclusion**

For the reasons listed above the Camden Draft Plan should be modified to by the deletion of C27 and the allocation of the site for Gypsy and Travellers.

Kind regards

Tamara Earley

Responder 13

Date: Thu, 12 Jun 2025 16:25:42 +0000  
From: Amy Tempest  
To: Rebecca Burden  
Subject: Mayor's response to LBC Local Plan Consultation (Regulation 19)

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I hope this e-mail finds you well.

Please find attached the Mayor's response to Camden Local Plan Regulation 19.

Many thanks,  
Amy Tempest  
**Senior Strategic Planner, London Plan and Strategic Planning Team**  
GREATERLONDONAUTHORITY  
Union Street, London [redacted postcode]  
My pronouns are she/her

Please note that I am working on a part-time basis, with my working days being Monday, Wednesday and Friday.

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**Rebecca Burden**

Development Plans Manager  
Planning Policy  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

**Department: Planning**

Our reference LDF06/LDD25/LP04/AT01

Date: 12 June 2025

By email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local  
Development) (England) Regulations 2012**

**Re: Camden Local Plan (Regulation 19) consultation**

Dear Rebecca,

Thank you for consulting the Mayor of London on the London Borough of Camden's (LBC's) proposed Draft Submission Local Plan (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.

The Mayor provided comments on the earlier LBC Local Plan (Regulation 18) consultation on 13<sup>th</sup> March 2024 (LDF06/LDD25/LP02/JB01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is in general conformity and more closely aligned within the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response.

**General**

The draft Local Plan is underpinned by a series of strategic objectives to help deliver the vision and ambitions of 'We Make Camden', which is a document that sets out the vision for the future of Camden. The strategic objectives of the draft Local Plan are broadly supported.

However, it is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan due to the proposed housing targets over the Plan period. Further detail on this is provided in the subsequent section of this letter.

**Opportunity Areas**

LBC contains three Opportunity Areas (OAs) identified within LP2021 – Tottenham Court Road, Kings Cross and Euston. The draft Plan states that limited development is expected in the Tottenham Court Road OA as development there is largely complete, with development in the King's Cross Area mainly delivered through two site allocations.

Table 2.1 of LP2021 sets out an indicative capacity for 2,800-3,800 homes in Euston OA along with 8,600-15,000 jobs. As set out in paragraph 2.1.1 of the LP2021, these figures should be used as a starting point to be tested through the assessment process. The draft Plan identifies that Euston is expected to deliver between 1,500 and 2,500 new homes. Noting that the indicative capacity is below that identified within Table 2.1, clarity on the capacity assumptions made for the Euston area by LBC would be welcomed.

Draft Policy S2 seeks to ensure that development within this area is in line with the vision and objectives set out within the Euston Area Plan (EAP). Consultation (Regulation 18) on the draft Euston Area Plan was undertaken in March 2023. It is understood LBC is working towards consulting on the Regulation 19 version of the updated Plan in Winter 2025.

## **Housing**

LBC's housing target as set out in Table 4.1 of the LP2021 is for the delivery of 10,380 new homes between 2019 and 2029 and incorporates a small site housing target of 3,280 new homes. This is equivalent to an annualised target of 1,038 homes a year.

For LBC's entire Plan period, 2026-2041, it is the intention to deliver 11,550 new dwellings. This is equivalent to a total of 770 homes being delivered a year. The proposed drop in the housing target is considered significant and is not consistent with paragraph 0.0.21 of the LP2021 which is clear that boroughs should only alter their housing targets where they have evidence demonstrating that they can exceed them.

The draft Plan states that this figure has been derived from the period of 2026 to 2029 of the London Plan, the housing capacity from large sites as set out in 2017 SHLAA, and the small sites target of 328 new homes per year set out within LP2021. The draft Plan indicates that cumulative backlog from under-delivery of completed homes from 2019/20 has also been taken into account, which has been identified as a little over 1,700 homes by April 2026.

As noted in the Regulation 18 consultation response, the current London Plan does not meet London's identified need and therefore the overall amount of housing required annually should not be expected to reduce. Whilst the above approach is in line with London Plan paragraph 4.1.11, in the context of working towards delivering 88,000 homes per annum as calculated at a national level through the standard method, this approach (specifically the text in 4.1.11) is now considered to be out of date. Boroughs who are currently working on their Local Plan, such as LBC, should seek, as a minimum, to roll over the current London Plan target beyond 2028/29, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.

The draft Plan acknowledges that the emerging London Plan will result in a new housing target for Camden once adopted, and as such the housing target contained within the Local Plan may only be in place for a short period of time. Whilst this is welcomed, it is recommended that there is flexibility in the draft Plan to safeguard for this eventuality. Consideration may need to be given to committing to an early Local Plan review following the publication of LBC's new housing targets within the emerging London Plan. The difficult current delivery environment is also noted, including LBC's difficulties in bringing sites forward.

## **Affordable Housing**

It is noted that the draft Plan identifies a borough wide delivery target of 3,000 additional affordable homes from 2026/27 to 2040/41.

The draft Plan sets a capacity-based approach to affordable housing, with this being detailed in draft Policy H4. The threshold for this Policy starts at 100sqm and the creation of at least one additional unit, with each additional 100sqm equating to the creation of one home. For smaller developments, a sliding scale target will apply, which is discussed in detailed below.

For major developments, which have been defined within the draft Plan as being 16 units or more, draft Policy H4B5 states that the London Plan's strategic affordable housing target of 50 per cent will apply, but will be subject to the London Plan's viability threshold approach. Policy H4 of LP2021 refers to the strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. To achieve this aim, specific measures are identified, which include, but are not limited to, the requirement for major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach, using grant funding to increase affordable housing delivery, and for public sector land and industrial land resulting in a net loss of industrial capacity to deliver at least 50 per cent affordable housing.

Noting this, seeking to apply the strategic target in a site-specific way is an incorrect interpretation of Policy H4. It is also unclear how this would work: for example, how would the 'benefit' or incentive of meeting the 35 per cent threshold as set out in Policy H5 of the LP2021 be realised if negotiations continue past this point up to 50 per cent? It is recommended that the draft Policy H4B5 is amended to remove the reference to the strategic housing target.

A sliding scale for affordable housing contributions for smaller developments is also proposed, starting at 2 per cent for developments with capacity for one additional home, increasing by 2 per cent for each home, reaching an affordable housing target of 30 per cent affordable housing for 15 units. The Mayor raises significant concerns that seeking affordable housing below 10 units is unlikely to support small builders and diversify the housing market. Overall, this is likely to be counter-productive in terms of both housing delivery and affordable housing delivery.

In terms of seeking affordable housing contributions for development schemes delivering 10 to 15 units, whilst the approach set out in the draft Policy differs from LP2021, given it is likely to promote small builders and reduce the 'cliff edge' impacts, it is considered to be an appropriate flexibility.

It is noted that there are references to tenure split being applied flexibly within the supporting text of the policy. Tenure mix is a policy criterion for viability assessments; therefore, it is recommended that this wording is removed.

Draft Policy H4B(8) sets out that 'for the largest developments involving housing (typically those providing 100 homes or more), the Council may seek affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision'. This policy should be supported by evidence to ensure deliverability.

Draft Policy H4(E7) states that the LBC will take into account the economics and financial viability of the development when considering whether affordable housing provision should be made on-site. This policy should be tested at plan making stage and viability assessments should not generally be expected at application stage unless a scheme proposed a non-compliant level of planning obligations i.e. lower level of affordable housing, which is already covered in Part B of the same policy.

It is recommended that the policy wording within draft Policy H4(F) is clearer on what the triggers are for viability reviews. If the triggers are in line with the London Plan, then it is questioned whether it is necessary to replicate this policy within the draft Plan as the same London Plan policy already applies to all relevant development proposals.

## **Viability**

LP2021 Policy DF1 identifies that affordable housing and necessary public transport improvements should be prioritised by decision makers when seeking planning obligations. There are a number of references within the policies and supporting text in the housing section of the local plan that refer to financial viability as a matter of consideration for development schemes. Whilst it is acknowledged that financial viability could be a material consideration, there is a concern that the references to such within the policy and supporting text could run counter and/or result in securing a lower level of planning obligations with applicants seeking to submit non-policy compliant schemes to justify the submission of viability information.

With this in mind, it is recommended that consideration is given to removing such references with the view of ensuring that viability testing is only used in a limited way as part of the decision-making process and that most applications would not be subject to protracted viability discussions in relation to a wide range of policy matters.

## **Specialist Older Persons Housing**

Draft Policy H8 supports the development of, and resists the net loss of, specialised housing for older people, people experiencing homelessness and other people with care or support requirements. Whilst this is welcomed, the draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBC should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of LP2021. For LBC, this is for the delivery of 105 units a year. In accordance with Policy H13 of the LP2021 LBC should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing.

## **Gypsy and Traveller accommodation**

Draft Policy H11 states LBC will aim to secure a sufficient supply of pitches/plots to meet the accommodation needs of Camden's established Traveller community over the Plan period to 2041. This is welcomed. The draft Plan identifies a need for 19 additional pitches over the Plan period. Two sites have been allocated within the draft Plan to provide the additional pitches required: S20 – York Way Deport and adjacent land at Freight Lane, and C27 Land adjacent to Constable House, Adelaide Road. It is anticipated that these sites could deliver a maximum of six pitches, and as such LBC is currently unable to meet their identified need over the Plan period.

Policy H14 of LP2021 states that a ten-year pitch target should be included within development plan documents. To be consistent with Policy H14 of the LP2021, LBC should clearly set out their ten-year pitch target and how they plan to meet those needs in full. The draft Plan should be updated to include this target and set out whether the two sites identified are able to fulfil the ten-year target or not. It is understood that LBC have written to other LPAs to ask whether they are able to meet the accommodation needs of Gypsies and Travellers. If LBC cannot meet their ten-year pitch requirement this would be a general conformity issue.

## Tall Buildings

There are a number of viewing corridors which run through LBC that should be taken into consideration when planning for tall buildings. These are Primrose Hill summit to St Paul's Cathedral; Parliament Hill oak tree to Palace of Westminster; Parliament Hill summit to Palace of Westminster; Parliament Hill summit to St Paul's Cathedral; and Kenwood viewing gazebo to St Paul's Cathedral. Extensions of the Blackheath Point to St Paul's Cathedral and Greenwich Park Wolfe statue to Tower Bridge also fall within the borough. It is recommended that the LVMF view corridors are included within the Policies Map and local plan.

When considering tall buildings in the locations affected by the views, the guidance in the London View Management Framework and Policy HC3 of LP2021 should be taken into consideration.

Draft Policy D2 sets out LBC's approach to tall building development within the borough. The draft Plan defines tall buildings as 40m within the CAZ and 30m elsewhere. This is in line with Policy D9 of the LP2021. Table 12 of the draft Plan details a number of sites in which tall buildings may be an appropriate form of development. It is recommended that appropriate heights are included within Figure 22 or Table 12 of the Plan, to provide clarity on what heights may be acceptable in the identified locations.

## Industrial land and Waste

Camden is located within the Central Services Area (CSA) that supports the Central Activity Zone. There are no SIL sites located within LBC. The draft Plan identifies an 'Industry Area' within the borough, which is equivalent to LSIS. The LSIS site is subject to a site allocation (C3 – Murphy Site), identified to deliver 750 additional self-contained homes. The site allocation states that development at this site should be 'employment-led' and seek to 'intensify industrial provision to increase, or at least maintain, industrial storage and warehousing capacity'. The site allocation needs to be clearer in terms of the amount of industrial space that is envisaged at this site.

Overall, the draft Plan identifies that there is just under 35ha of industrial land within LBC. The draft Plan does not identify the amount of industrial capacity that is required to be delivered over the Plan period. This should be provided and broken down so that is clear what the need is for Class B uses. It is noted that draft Policy IE3 sets out a 'manage and protect' approach to the supply of industrial and warehousing land within the borough, but this should be strengthened to ensure that sufficient supply is planned for to meet demand.

Within LBC's industrial land there is one waste management site, and one aggregates site. The waste management site is identified within the North Waste London Plan, with the aggregates site safeguarded through draft Policy S1(Q). The Regis Road site allocation includes LBC's waste management site. The site allocation is clear that the development must retain or re-provide the Regis Road Recycling Centre, unless suitable compensatory sites are provided elsewhere that replace the existing provision. It should be noted that if the waste site is identified as surplus capacity, it should in the first instance be offered to other LPAs within London who are unable to meet their apportionment requirements.

It should be ensured that LSIS, waste sites and aggregate sites are clearly identified on the Policies Map.

## **Office Development**

The draft Plan sets out an estimate that circa 400,000sqm of floorspace will be provided for office and research development uses over the Plan period. Draft Policy IE2 seeks to manage and protect the stock of offices within the borough. The draft Plan contains site allocations seeking to provide office floorspace. Office floorspace should be directed towards the CAZ, town centres and Opportunity Areas.

## **Town Centres/CAZ**

The south of Camden forms part of the Central Activities Zone (CAZ), as defined in Policy SD4 of the LP2021. Part N of Policy SD4 sets out that Development Plans should look to define the boundary in detail and include on policy maps. Policy SD5 states that new residential development should not compromise the strategic functions of the CAZ.

## **Transport**

The draft Plan sets out a number of policies that support shifting journeys to sustainable modes, adopt the Healthy Streets Approach and exceeding London Plan requirements for car parking and cycle parking, which is supported. We particularly commend LBC for retaining the requirement for car-free development across the borough.

The Camden Town station capacity upgrade remains a project of strategic importance given it is an essential enabling component of a future Northern line upgrade, which would allow more than the current 24 trains per hour. We therefore encourage LBC to carefully consider how the policies and site allocations in the plan could make the most efficient use of land to help deliver this upgrade alongside step-free access.

LBC is encouraged to make clear in the draft Plan where and how bus infrastructure, including priority measures, will be enhanced to support the efficient operation of the bus network and improved journey times. Relevant site allocations should be more specific with infrastructure requirements to protect access to the bus network and enhance infrastructure as part of development and design principles, linked to achieving sustainable mode share targets. LBC should make the safeguarding limits, including sites of surface interest, clear within the draft Plan. This includes within site allocations which are subject to Crossrail 2 safeguarding directions. Policy should clearly set out the process for safeguarded sites and how this might impact development within the relevant site allocations.

Further comments on Transport elements can be found within TfL's detailed comments, which are provided in a separate response.

## **Green Spaces**

There are four areas of MOL within Camden: Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir, and Highgate Cemetery/Waterlow Park/Fairseat. Draft Policy NE1 seeks to give strong protection to maintaining the openness and character of MOL. It is noted that the supporting text for this policy states that LBC will 'protect the openness and character of these spaces in accordance with London Plan Policy and Policy guidance in the National Planning Policy Framework (NPPF) on Green Belts'. For clarity, the GLA do not consider the changes to the NPPF in December 2024 to apply to MOL and will be seeking to address this through the new London Plan.

# GREATER LONDON AUTHORITY

## Next Steps

I hope these comments positively inform the ongoing preparation of LBC's Local Plan. GLA officers are keen to continue working with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering LBC's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Amy Tempest at [REDACTED]

Yours sincerely,



Lisa Fairmaner

## Head of the London Plan and Strategic Planning

Cc: Anne Clarke, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning and Regeneration Committee  
National Planning Casework Unit, MHCLG

## Responder 14

Date: Fri, 13 Jun 2025 19:37:48 +0000

From: Mando Watson

To: PlanningPolicy

Subject: response from local resident regarding draft local plan chapter 4.13, site reference 27

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## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	Dr		
First Name	Mando		
Last Name	Watson		
Job Title			
(where relevant)			
Organisation			
(where relevant)			
Address Line 1*	██████████		
Address Line 2			
Post Town*	██████		
Post Code*	██████		
Telephone Number			

E-mail Address			

**Camden Local Plan – Proposed Submission Draft 2025 - Representation Form**

<b>Part B – Please use a separate page for each representation</b>						
Name or Organisation: Mando Watson, local resident						
<p><b>3.</b> Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.  Documents can be found at the following links:</p> <ul style="list-style-type: none"> <li>Camden Local Plan Proposed Submission Draft – <a href="#">Draft new Local Plan - Camden Council</a></li> <li>Draft Policy Map - <a href="#">Draft new Local Plan - Camden Council</a></li> </ul>						
Paragraph	chapter 4.13, site reference 27	Policy			Policies Map	
<b>4.</b> Do you believe the Camden Local Plan Proposed Submission Draft is:						
(1) Legally compliant	Yes			No		
(2) Sound	Yes			No		
(3) Complies with the Duty to co-operate	Yes			No		
*See guidance note at the end of the form for assistance with completing this section.						
If you have entered <i>Noto 4.(2)</i> , continue with Q5, otherwise please go straight to Q6						

**5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:**

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)		
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	correct	
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	correct	
(4) Consistent with national policy	correct	

\*See guidance note at the end of the form for assistance with completing this section.

**6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**  
**If you wish to support the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.**

The proposal for a gypsy/traveller site adjacent to Constable House is unjustified, ineffective and inconsistent with national policy because:

**1. Loss of play area to children and young people.**

The site is currently used for play and outdoor space in an otherwise very busy urban site. Children from the council block use the space. Community leaders have planted trees and wild flowers to enhance the space. It is important for the council to prioritise the needs of children and families. These children represent our future.

**2. Population density.**

Those of us who live nearby witness the very significant numbers of people using the area, either as local residents, or as visitors to Primrose Hill on sunny days, or as tourists visiting Camden Market or as visitors to the Roundhouse or as users of Chalk Farm underground station. This activity comes in frequent episodic surges. Any council leaders who live locally will know this, even if, at times the area can be quiet. There is no capacity to increase the density of use of this area without considerable risk to safety

**3. flood risk**

As a (very) local resident I experience floods in my home whenever there is a significant downpour. The space adjacent to Constable House is directly in the line of water flow. I would be happy to show you. Ignoring this would be irresponsible of the council

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above. You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

The proposal for a gypsy/traveller site adjacent to Constable House should be removed from the plan

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.  
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

		<b>No</b>		<b>Yes</b>
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9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.*

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	
(b) when the Inspector's Report is published	
(c) when the Camden Local Plan is adopted	

**Privacy Notice**

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

<b>11.</b>		<b>Date:</b>	
<b>Signature:</b>			

## Notes to accompany the Representation Form

### 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

### 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.

- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

### 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national

- planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
  - If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
  - If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 15

Date: Sat, 14 Jun 2025 12:20:10 +0000  
From: Nadia Crandall  
To: PlanningPolicy  
Subject: Allocation of Land Adjacent to Constable House Adelaide Road as a Gypsy and Travellers Site: Site allocation C27

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These are my personal details:

[redacted]

[redacted email]

I would like to participate at the examination hearings.  
I would like to be added to the Council's consultation data base for the next stages of the Camden Local Plan

**I suggest that the Council should delete Site Allocation C27: Land Adjacent to Constable House, Adelaide Road, for Gypsy and Traveller Accommodation.**

My reasons are as follows:

1. There has been no consultation with local residents on allocating this land and neighbours became aware of this only with the submission draft local plan in May 2025. This has left very little time for those affected to consider the draft proposals and prepare their comments.
2. The site is immediately adjacent to Constable House and provides open space for residents in an already extremely dense urban environment. It represents a very important green area with trees and wild flowers.
3. There is currently no road access to the site, so any development would represent serious disruption to the residents of Constable House and other neighbouring residential blocks.
4. The site is overlooked on all sides by tall buildings and is on a key transport and bus route. This would impact on the privacy of the site as a permanent Gypsy and Traveller location.
5. There is a ball court on the site, which is often in use by local residents. Young people would suffer from its loss.

I would urge you to take these issues into consideration and reconsider the proposed site allocation. Please confirm receipt of this communication.

Nadia Crandall

[redacted email]

[redacted]

Responder 16

Date: Sat, 14 Jun 2025 19:59:29 +0000  
From: Edwards, Michael  
To: PlanningPolicy  
Subject: Additional platform at Camden Road / highline

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My attention has been drawn to the draft plan, Infrastructure section, para O where aspirations 3 and 4 are surely incompatible. If the Highline were built it would prevent the re opening of the 4 track version of the North London Line / Overground and vice versa.

As a north London citizen, a regular user of the Overground and one of the proponents of the circular joining up in the early years of the new century, I am a very strong supporter of the line and very keen to support its future growth. I am also conscious that the 4 track segment through Camden Road would facilitate international trains running through to the WCML.

Accordingly I urge you to delete the Highline from this part of the draft plan.

Yours sincerely, Michael Edwards

\*\*\*\*\*end\*\*\*\*\*

New London Plan process has briefly opened to the citizens. Follow [REDACTED]

I am leaving twitter (X) and am now using [REDACTED]

Michael Edwards, Hon Prof, Bartlett School, UCL [redacted address], [redacted postcode]  
[REDACTED]

Responder 17

Date: Sun, 15 Jun 2025 09:24:27 +0000  
From: avigail  
To: PlanningPolicy  
Subject: Camden Nature Corridor

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Dear Camden Council, As a Camden resident I am writing to support your proposal for a Camden Nature Corridor in the draft Local Plan. We urgently need to restore nature in our Borough and to bring more nature into our neighbourhoods, to address climate change and improve well-being. New housing proposals create a unique opportunity to do this by improving nature in Camden Sites of Interest for Nature Conservation and connecting them through new developments. Therefore, I strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

Kind regards

Avigail Ochert

[redacted address]



[redacted postcode]

Responder 18

Date: Sun, 15 Jun 2025 09:36:37 +0000

From: Alcock

To: PlanningPolicy

Subject: Nature Corridor

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*We need urgently to restore nature in our Borough and to bring more nature into neighbourhoods, to address climate change and improve well-being.*

*New housing proposals create a unique opportunity to do this by improving nature in Camden Sites of Interest for Nature Conservation and connecting them through new developments. Therefore, I strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).*

*I look forward to following the progress of this interesting and forward-thinking plan.*

*Yours faithfully,*

*Elizabeth Alcock*

Responder 20

Date: Mon, 16 Jun 2025 17:21:20 +0000  
From: Jeremy Walker  
To: PlanningPolicy  
Subject: Local Plan Nature corridor

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*I am writing to strongly support your proposal for a Camden Nature Corridor in the draft Local Plan. We urgently need to restore nature in our Borough and to bring more nature into our neighbourhoods, to address climate change and improve well-being. New housing proposals create a unique opportunity to do this by improving nature in Camden Sites of Interest for Nature Conservation and connecting them through new developments. Therefore, I strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page [120](#)), [Regis Road](#) (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).*

*Best regards*

Jeremy Walker  
  


Date: [REDACTED]  
To: PlanningPolicy  
Subject: Camden Road station

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Your local plan should not support the Camden Highline

It should support reopening that piece of land for London Overground and freight trains through Camden Road station.

That is the demand of transport for London, in the document called the "London Rail freight strategy"

you should include that in your submission

that document it's got small scale schemes all over London and transport for London where heavily involved.

The current local plan says the following are you going to do this the same wording in the next one,

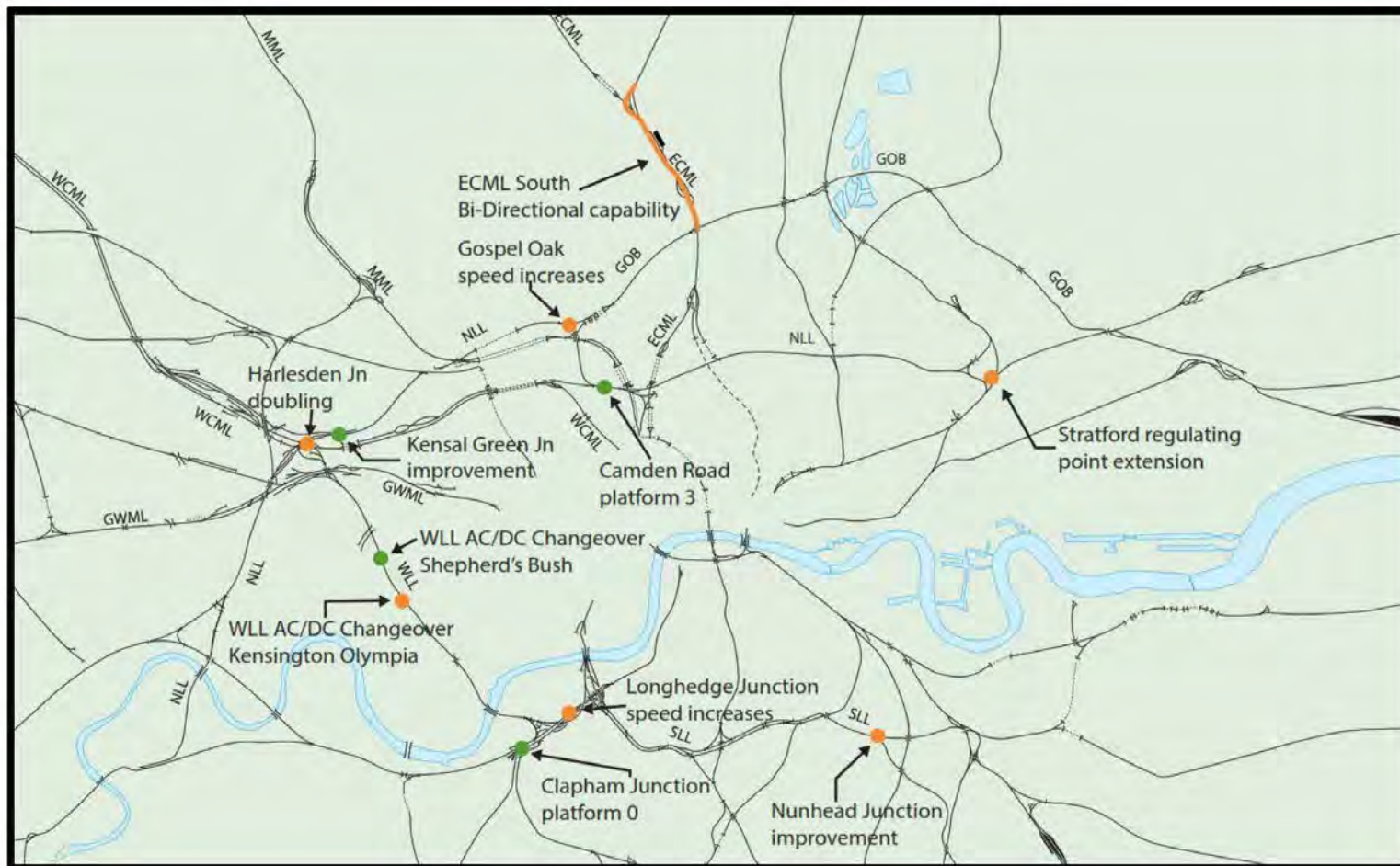
Policy T3: Transport infrastructure

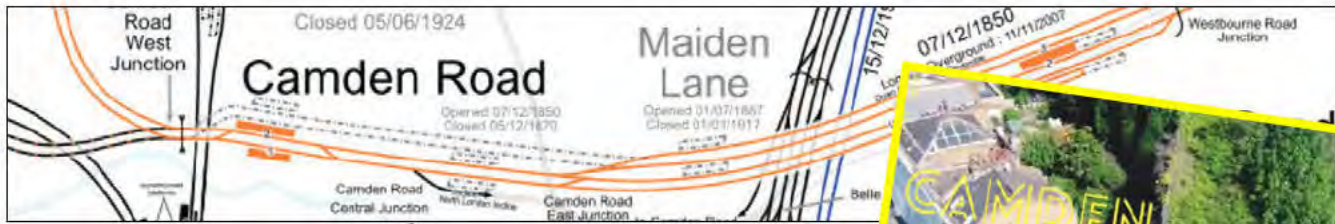
"The Council will seek improvements to transport infrastructure in the borough.

"We will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects."

John Cox

MAP SHOWING THE CORE INTERVENTIONS (GREEN)  
AND THE ADDITIONAL OPTIONS (ORANGE)





### CAMDEN ROAD PLATFORM 3



This proposal would reinstate a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.

The additional capacity provided would facilitate much greater flexibility in pathing options for trains on this busy central section of the NLL, opening up new options for future service provision and bolstering performance resilience. Reinstatement of a third platform would enable platform 2 to be used as a central turnback, with platform 3 becoming the eastbound line for through London Overground services and the majority of freight. Transport for London modelling suggests that the eastern end of the NLL, from Canonbury to Stratford, will see some of the strongest long-term demand growth on the Overground network. A turnback platform will allow this to be addressed with peak capacity boosting Stratford-Camden Road services and there would also be the option to operate these through the off-peak, which could offer a means of providing additional passenger capacity where it is most needed. The availability of an additional platform would also aid performance recovery during perturbation on the orbital routes.

Camden Road platform 3	Kensal Green junction improvement	WLL AC/DC changeover relocation	Clapham Junction platform 0	NLL, GOB and WLL headway reductions
Reinstatement of a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.	Upgrade of the junction, moving it slightly to the east and realigning the layout, to facilitate faster crossing speeds sufficient for a 3-minute planning margin.	Extension of the overhead wires further along the WLL, to provide AC electrification as far south as Shepherd's Bush station.	Creation of additional bay platform capacity at the northern end of Clapham Junction station, for the use of London Overground WLL services.	These are improvements on which this strategy is dependent, but are expected to be realised through wider enhancement programmes, so are not being directly proposed by the LRFS.

## 2022/2019/P

*My further opposition, given the realistic (and accepted) inability to speak to the committee within the five minutes allotted to all opponents.*

The railway industry overwhelmingly believes this loss of strategic railway, for future expansion of capacity, is very short-sighted. It is a project of well-meaning volunteers and a borough's political leadership, like Boris's Garden Bridge or Westminster's Marble Arch Mound.

If the Council Leader wants to go up in the air for tourists, refurbish Camden Road station and add outstanding vegetation and climbable vertical structures to it. Just leave the UK's railway corridor alone.

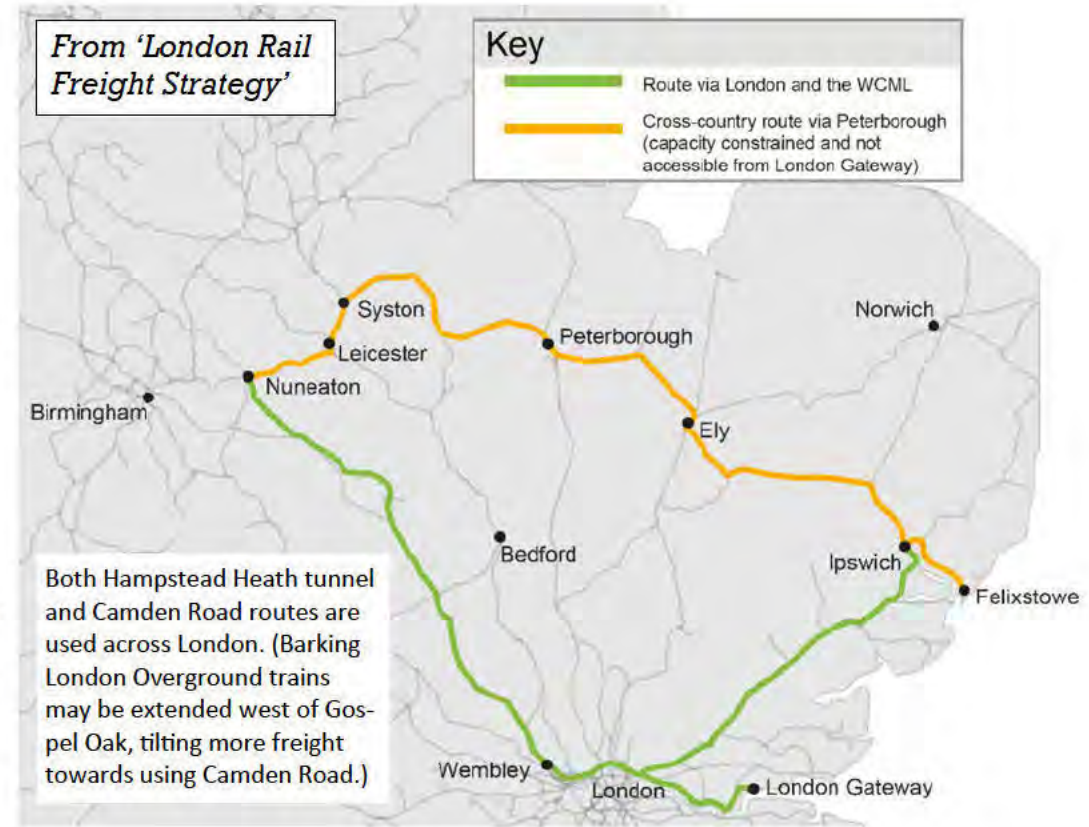


How have we got here? Were officers just saying **“Yes, Leader”** instead of **“That would be a very brave decision, Leader!”** Would free-thinking Camden officers prosper in a world of ‘ambition’ by the political leadership?\*

Why did officers not point out the helpful Camden Local Plan? It says under **Policy T3: Transport Infrastructure** the exact *OPPOSITE* of the position of the applicant: **“The Council will seek improvements to transport infrastructure in the borough. We will:**

**(a) Not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and**

**(b) Protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.”**



At what stage was this converted from a ‘20-year or 30-year project’ to a permanent one? The applicant’s documents ooze with **“meanwhile”ness**, and **“temporary”ness**, yet there is NO mention of “meanwhile” (in this meaning) or “lease” from Network Rail in the officer report to committee. Are project lifespan and questionable financial viability in the use of Camden’s land not material planning considerations, at least to mention, even if then dismissed?

Would ‘permanent’ avoid a provision in Camden’s annual accounts to potentially **remove** the highline from its property (since the applicant seems unwilling to make provision) either at the end of a lease or because of **insolvency**? The committee legal advisor should be asked.

## What of “The Strange Case of Network Rail”?

**National NR strategy management** has produced a collaborative rail freight strategy for London, after much hard work. Yet it is ignored by a **small group of local managers\***. The fact they want the rental income from the highline is outrageous; if they were incentivised to maximise income, either financially or in career terms, then that would become ‘interesting’. This subject is being investigated.

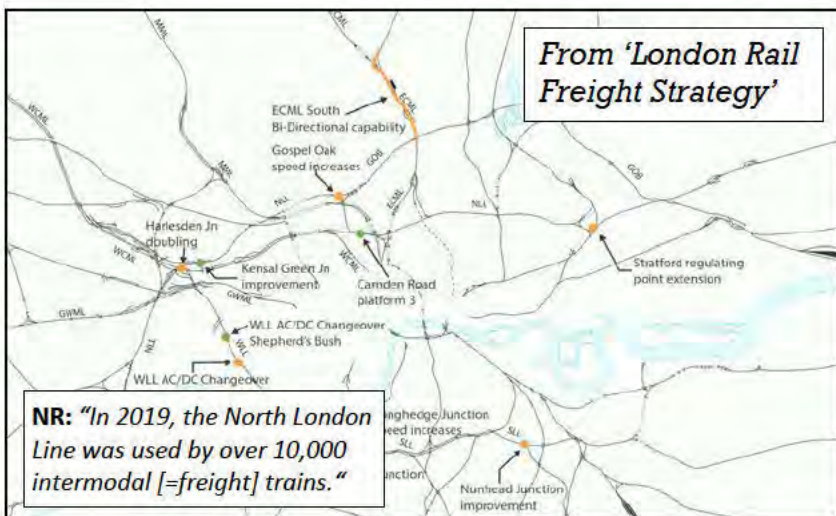
*\*No non-professional wrong-doing is alleged.*



The committee must not accept that **‘Network Rail [“we run, look after and improve Britain’s railway”] is in favour’** (and permanently so?) when the London Rail Freight Strategy document has been freely available on the Network Rail web site for 20 months, for transport and planning officers to digest and councillors to be informed. Camden must act ‘reasonably’ under the precedent of English common law, such as the Wednesbury Rules (ask the legal advisor again).

**Transport for London** wants extra London Overground capacity west of Stratford, and a **third** platform at Camden Road is considered the

best option, providing Camden with extra LO trains (and eventually maybe direct trains to Queens Park and Old Oak Common?)



The applicant says the old Camden bridges need very extensive work for railway use. But experienced, bridge-repairing, structural engineers say shot-blasting and repainting may largely be sufficient, maybe with extra welded steel added in places, and then a new steel deck. Easy-peasy.

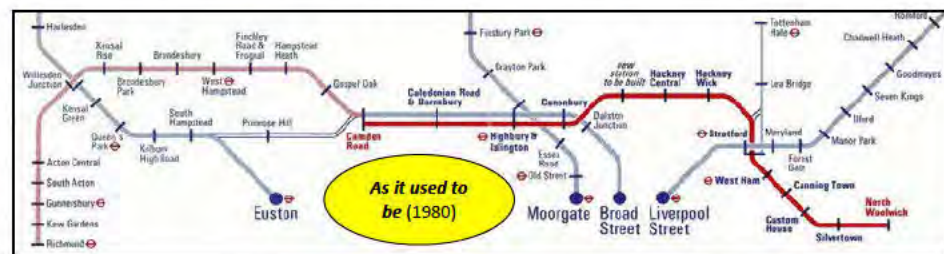
They say the two-tracks-only over Kentish Town Road mean no extra trains, but modern stock can accelerate well, so no problem.

The **third platform** is still in place at Camden Road station, so no extra access infrastructure of stairs and lift is required.

Officers must warn the committee of ‘optimism-bias’ in the applicant’s usage predictions (as in **“Well, they would say that, wouldn’t they?”**)

Freedom of Information responses show TfL insist the highline provides little ‘transport function’ (like Boris’s dangleway!) and they resist releasing any Section 106 money to Camden from the Kings Cross development (the money was meant to go towards more buses in Camden). Luckily, TfL are lavish with their detailed FoI responses, so all conversations with Camden (over years) can eventually be published.

So then: The **highline** needs to raise ‘£50-million’ (ref: Camden New Journal), and may fail to do so; politicians may get an adequate briefing on the railway industry; Camden must make **provision** to remove it, and Network Rail will need **provided funds** to remove it. Don’t give consent in the first place, and support freight and passenger railways.



## Responder 21

Date: Tue, 17 Jun 2025 15:02:59 +0000  
From: John Cox  
To: PlanningPolicy  
Subject: Re: Camden Road station

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On Tuesday 17 June 2025 at 15:45:59 BST, John Cox <[redacted email]> wrote:

please see attached.

These are affordable London-wide schemes - it is not up to a borough to oppose.

On Tuesday 17 June 2025 at 13:31:42 BST, John Cox <[redacted email]> wrote:

Some adverts over the last two years in the Camden New Journal which seemed to have quite strong arguments to keep the railway track positions for trains not for a park.

[Sent from AOL on Android](#)

On Mon, 16 Jun 2025 at 18:55, [redacted email]  
<[redacted email]> wrote:

[Redacted content]

Your local plan should not support the Camden Highline

It should support reopening that piece of land for London Overground and freight trains through Camden Road station.

That is the demand of transport for London, in the document called the

"London Rail freight strategy"

you should include that in your submission

that document it's got small scale schemes all over London and transport for London where heavily involved.

Sent from [Outlook for Android](#)

Responder 21

Date: Tue, 17 Jun 2025 14:45:59 +0000  
From: John Cox  
To: PlanningPolicy  
Subject: Re: Camden Road station

---

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"London Rail freight strategy"

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Sent from [Outlook for Android](#)

# Camden Council: *Stop funding the* **Highline!**

Remember  
your existing  
“Camden  
Local Plan”?

Campaign to  
reopen third  
platform at  
Camden  
Road station  
instead!



***Plat-  
form  
three!***

***CNJ readers:*** Tell [mayor@london.gov.uk](mailto:mayor@london.gov.uk) that you support his (so far unfunded) plan to reopen platform 3, for MORE LONDON OVERGROUND TRAINS on the North London Line, and ask for further studies and costs.

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

# Don't fund the Camden **Highline!**

Back the Mayor, to reopen Camden Road Station's **Platform Three** instead!

= More public transport, and smoother so quieter goods trains (+electric, not diesel).



**CNJ readers:** Tell [mayor@london.gov.uk](mailto:mayor@london.gov.uk) that you support his (so far unfunded) plan to reopen platform 3, for MORE LONDON OVERGROUND TRAINS on the North London Line, and ask for further studies and costs.

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

**Ask leader  
Georgia.  
Gould  
@camden.  
gov.uk :-**



**“Instead of a  
Highline at  
Camden Road  
Station – help  
Sadiq Khan to soon REOPEN PLATFORM 3!!!”**

## **CAMDEN LOCAL PLAN: Policy T3: Transport infrastructure**

**“The Council will seek improvements to  
transport infrastructure in the borough.**

**“We will not grant planning permission for  
proposals which are contrary to the  
safeguarding of strategic infrastructure  
improvement projects.” – like Platform 3!!!**

**Why won't you support 50% more London  
Overground trains across Camden???**

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

# ***No more public money towards the Highline!***

**See Camden's  
existing  
'Local Plan'  
(Policy T3).**

**Support the  
reopening of  
*platform 3*  
at Camden  
Road Station  
instead!**



**CNJ readers: Tell [mayor@london.gov.uk](mailto:mayor@london.gov.uk) that you support his plan to reopen platform 3, for up to 50% MORE LONDON OVERGROUND TRAINS on the North London Line. Ask for final studies and funding for the project!**

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

**QUESTION to  
Camden Leader Georgia Gould!**



**“Do you like seeing a London Overground train arrive?”**

**It could soon be 50% more often, if the Camden Highline was scrapped!**

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

# ***Abandon the inferior Highline!***

**PLATFORM**  
plan from  
Mayor  
Sadiq Khan  
at **Camden  
Road Station**  
is better!

Adds up to 50%  
more **London  
Overground**  
trains on the  
North London  
Line.

**3**



***CNJ readers: (1) Tell [mayor@london.gov.uk](mailto:mayor@london.gov.uk)  
that you support his plan and why.***

***(2) Ask [Georgia.Gould@camden.gov.uk](mailto:Georgia.Gould@camden.gov.uk)  
to justify the Highline instead of better  
public transport!***

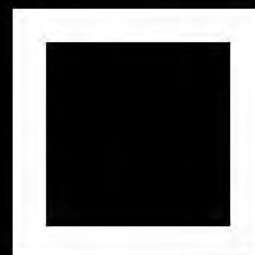
[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

# **Camden's election day!**

**(The two projects are on the SAME land, so BOTH are not possible.)**

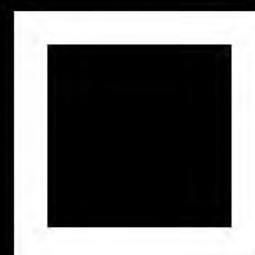
## **(1) 'THE CAMDEN HIGHLINE'**

**£50-million tourist attraction.  
Promoters say 'for 20-30 years'.**



## **(2) 'CAMDEN ROAD PLATFORM 3'**

**Project of Sadiq Khan and the  
rail freight industry. Allows 50%  
more London Overground trains.**



**IF YOU VOTED (2), ask the council leader  
[Georgia.Gould@camden.gov.uk](mailto:Georgia.Gould@camden.gov.uk) to back the  
Mayor's 'Platform 3' plan, not the Highline.**



**If you voted (1), ask [Georgia.Gould@camden.gov.uk](mailto:Georgia.Gould@camden.gov.uk) who  
would PAY to remove the  
Highline. (Could a £50 million  
project really be 'temporary'?)**

[www.futuretransportlondon.org](http://www.futuretransportlondon.org)

## Responder 22

Date: Tue, 17 Jun 2025 11:00:55 +0000  
From: Alexander Nicoll  
To: PlanningPolicy  
Subject: Hampstead Forum comments on draft Camden Local Plan 2025

---

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear planning policy team,

Please find attached comments from the Hampstead Neighbourhood Forum on the new draft Camden Local Plan.

We hope they are helpful.

Best wishes,

Alex Nicoll



## HAMPSTEAD NEIGHBOURHOOD FORUM

Planning Policy  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

17 June 2025

Re: comments on Camden Local Plan 2025

Dear Planning Policy team,

We welcome Camden's strengthened approach to basement development controls in the Local Plan Draft 2025, particularly the intention to prevent building under gardens. However, we note an inconsistency in wording between Policy D6, section C (3), and clause 12.131 regarding basement footprints.

The phrase "not exceed the footprint" in Policy D6 is ambiguous and could be interpreted as allowing basements to spread beyond the building's perimeter, provided the total area does not surpass the building footprint. In contrast, "not extend beyond the footprint" in clause 12.131 is clear and unambiguous, effectively preventing basements from encroaching under gardens or open spaces.

### **Why Basements Under Gardens Are Harmful**

Strong evidence from across London—including research by the London Wildlife Trust, Greater London Authority, DEFRA, and several boroughs—demonstrates that basement construction under gardens causes:

- Permanent loss of wildlife habitat and ecological corridors.
- Damage to mature trees and their root systems.
- Reduced soil permeability, increasing flood risk.

Building basements under gardens cause the loss of green infrastructure and undermines climate resilience:

- **Loss of Biodiversity and Habitat:** Gardens are vital urban habitats, supporting a wide range of wildlife and acting as ecological corridors. Excavating for basements destroys these habitats and fragments green networks, leading to a measurable reduction in local biodiversity. The 2025 Hampstead Neighbourhood Plan and studies from other boroughs confirm that garden loss undermines ecological connectivity and the health of urban wildlife populations.

- **Damage to Trees and Root Systems:** Mature trees depend on extensive root systems that often extend well beyond the visible canopy. Basement excavation severs these roots, threatening tree stability and survival. Even retained trees suffer from reduced rooting volume and soil compaction, which can cause long-term decline or death. The Royal Borough of Kensington and Chelsea found that each basement development can result in the loss of multiple garden trees, with cascading effects on local biodiversity.
- **Water Management and Soil Permeability:** Gardens play a crucial role in absorbing rainfall and reducing flood risk. Basement construction replaces permeable soil with impermeable structures, diminishing the land's ability to absorb water and increasing the risk of surface water flooding. This is particularly concerning in Hampstead, where clay-rich soils and a high-water table make the area sensitive to changes in drainage and groundwater flows. Disturbing these soils can worsen shrink-swell cycles, destabilize foundations, and further stress remaining trees and vegetation.
- **Cumulative Environmental Impacts:** The cumulative effect of many basement developments erodes the borough's green infrastructure, undermining its resilience to climate change and its ability to provide ecosystem services such as urban cooling, flood alleviation, and habitat provision. Camden's own planning guidance and policies emphasize the need to avoid harm to the natural environment, local amenity, and water conditions, requiring robust Basement Impact Assessments to address these risks

## Recommendations

For these reasons, we urge Camden Council to revise Policy D6 to adopt the clearer wording "not extend beyond the footprint of the host building." This will ensure consistent and effective protection of gardens, trees, and biodiversity, and safeguard Hampstead's distinctive soil and water conditions. We also recommend that the Local Plan includes explicit definitions of "footprint" and "basement extension" to avoid ambiguity and strengthen enforcement.

By adopting these measures, Camden will help preserve the character, ecological value, and environmental resilience of its neighbourhoods, in line with the evidence and objectives set out in the 2025 Hampstead Neighbourhood Plan and supported by technical guidance across London.

Yours sincerely,

Alex Nicoll  
Chair, Hampstead Neighbourhood Forum



# Responder 23

**From:** [Beth Barber](#)  
**To:** [PlanningPolicy](#)  
**Subject:** Camden Local Plan Consultation: Camden Nature Corridor proposal  
**Date:** 17 June 2025 12:20:47  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Buglife letter of support for Camden Green corridor.docx](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden Council,

Please find attached a letter in support of your proposal for a Camden Nature Corridor in the draft Local Plan. In particular, Buglife would like to express their support for Policy C1 paragraph 19 and Policy N1 paragraph 7 (the creation of this Corridor from Hampstead Heath through North and Central Camden), and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

Many thanks,  
Beth Barber

Beth Barber  
Development Officer



[REDACTED]  
[buglife.org.uk](http://buglife.org.uk) | Connect with us on [LinkedIn](#)

*Saving the small things that run the planet* - Sign up to BugBytes [e-news](#)

**Our insects are in decline and need your help**

May 1 - September 30

Download the free #BugsMatter app today

Let's make every journey count!

Available on the [App Store](#) and [Google Play](#)

The advertisement features a hand holding a smartphone displaying the app interface, with a blurred background of a dog's head.

Sign-up today! [Download the Bugs Matter App](#)



Company No. 4132695 | Registered Charity No. 1092293 | Scottish Charity No. SC040004



BY E-MAIL

17 June 2025

Dear Camden Council,

### Camden Local Plan Consultation

I am writing to support your proposal for a Camden Nature Corridor in the draft Local Plan. In particular, I strongly support Policy C1 paragraph 19 and Policy N1 paragraph 7 to create this Corridor from Hampstead Heath through North and Central Camden, and also the proposal that the Corridor be specifically included in future development of Murphy's Yard (paragraph 31, page 120), Regis Road (paragraph 33, page 116) and West Kentish Town Estate (paragraph 7, page 148).

Buglife is the UK's only organisation devoted to the conservation of all invertebrates. Our vision is a wildlife-rich planet where other species thrive alongside people; our mission is halting the extinction of invertebrates and achieving sustainable populations. Through our public engagement events and volunteer workshops, we inspire people of all ages to learn about and protect invertebrates for future generations.

One of Buglife's main strategic priorities is combatting the loss of pollinating insects and their habitat. Our 'B-Lines' programme delivers an imaginative and beautiful solution to the problem of the loss of wildflower meadows, nature-rich grasslands and insect pollinators. B-Lines are a series of 'insect pathways' running through urban and rural areas, along which we are restoring and creating a series of wildflower-rich habitat stepping-stones. They represent areas where nature restoration can be most impactful by linking existing wildlife areas together, contributing to a nature recovery network that will weave across the UK to produce a landscape that is buzzing with wildlife and packed with wildflowers, improving the environment for invertebrates and people alike. Better connected habitats not only allow bees, butterflies and a host of other wildlife, including small mammals, birds and amphibians to move freely through the landscape but are also more resilient to the effects of climate change and other environmental pressures.

Get London Buzzing is Buglife's flagship programme to engage people living and working in London in conserving pollinating insects and restoring their habitat. We want to catalyse even more individuals and communities to take positive action for London's wildlife and create a greener, more biodiverse city for all and therefore we are pleased to offer our support to the proposed Camden Nature Corridor which also sits within the B-line that runs north-south through central London.

If you require any further details relating to our support for this aspect of the Camden Local Plan, please feel free to contact me.

Yours sincerely,

Beth Barber

Development Officer

**Saving the small things that run the planet**

Buglife – The Invertebrate Conservation Trust is a registered charity

Registered Charity No: 1092293 | Scottish Charity No: SC040004 | Company No: 4132695

## Responder 24

Date: Tue, 17 Jun 2025 17:35:19 +0000

From: Mark Walton

To: PlanningPolicy

Subject: Formal Representation – Objection to Site C27 (Land adjacent to  
Constable House, Adelaide Road) – Camden Local Plan

---

**From:** [REDACTED]  
**To:** [PlanningPolicy](#)  
**Subject:** Formal Representation – Objection to Site C27 (Land adjacent to Constable House, Adelaide Road) – Camden Local Plan  
**Date:** 17 June 2025 18:35:41

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You don't often get email from [REDACTED] [Learn why this is important](#)

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Planning Policy Team,

I am writing to submit a formal representation objecting to the proposed allocation of Site c27 (Land adjacent to Constable House, Adelaide Road) as a Traveller and Gypsy site in Camden's Local Plan Proposed Submission Draft. [REDACTED]

This site is directly adjacent to my building and sits at the heart of a long-established residential community of over 360 flats (The Etons). I strongly oppose this proposal on the grounds of legal compliance, duty to co-operate, and soundness as required under national planning policy.

### **1. Legal Compliance**

Camden has failed to meet its own obligations under the Statement of Community Involvement (SCI). No meaningful consultation took place with residents prior to selecting Site c27. As a directly affected resident, I was not contacted or invited to contribute to the process. In a borough that claims to champion engagement, this omission is unacceptable and renders the Plan legally vulnerable. The site was chosen with no clear public rationale, no dialogue, and no transparency. A legal consultation process must involve the community from the outset — not after decisions have been made.

### **2. Duty to Co-operate**

Camden acknowledges a shortfall in meeting its identified need for Traveller pitches (6 proposed vs. 16 needed), but there is no evidence it worked seriously with neighbouring boroughs to share that responsibility. Nor is there evidence of collaborative planning with the Traveller community, which reportedly identified more suitable alternatives (such as in Kentish Town) — all dismissed without explanation. This is not “constructive engagement.” It is Camden acting unilaterally. The duty to co-operate, as a legal test, is about partnerships and transparency — not internal box-ticking. This proposal fails that test.

### **3. Soundness – Not Positively Prepared, Justified, Effective, or Consistent with National Policy**

The allocation of Site c27 does not meet the four tests of soundness under the National

Planning Policy Framework (NPPF). It is poorly located, weakly justified, and incompatible with the surrounding environment.

### **a) Not Positively Prepared**

The area around Chalk Farm has already absorbed more than its share of high-impact development:

- A major student accommodation block under construction by the Roundhouse;
- The 5–17 Haverstock Hill development adjacent to Eton College Road/Adelaide Road ;
- A newly approved 59-room hotel directly opposite Chalk Farm Station.

This neighbourhood is already straining — more noise, more late-night disruption, more traffic and parking stress. Introducing a Traveller site in the middle of this only adds to the burden. Camden should be supporting this community, not weakening it.

### **b) Not Justified**

There is no evidence that Site c27 is the most appropriate option. Other sites were dismissed for reasons — size, access, amenity loss — that apply equally here. Meanwhile, better-suited locations suggested by the Traveller community were rejected without explanation. The choice of this site appears to be driven by land ownership, not planning merit. That is not justification — it's expedience. Additionally, this proposal ignores the cumulative impact of:

- **Perceived impact on property values** – Buyers and investors are sensitive to neighbourhood change. The proximity of a Traveller and Gypsy site may lead to market hesitation, suppressed demand, and downward valuation pressure. This affects people's homes, mortgages, and retirement plans.
- **Social cohesion risks** – Residents worry about lifestyle and cultural clashes, particularly in areas like this with a dense, family-based population. No integration plan has been presented. Without proactive engagement, tension is inevitable, and this proposal does nothing to prevent it.
- **Planning and aesthetic incompatibility** – This is a prime location in central London, surrounded by purpose-built mansion blocks and historic architecture. Caravan-style accommodation does not fit the design or urban context. It feels imposed, temporary, and dissonant — not thoughtfully integrated.
- **Security and anti-social behaviour fears** – While often generalised, concerns about fly-tipping, loitering, or disorder are real and based on experience in this area of London. We are struggling hugely with disorder during events at the Roundhouse. This proposal does nothing to reassure residents or provide management plans.
- **Strain on services** – Local schools, health services, and transport are already stretched. Chalk Farm Station is overwhelmed during events. A new community, however small, adds to that pressure — but Camden has not assessed or planned for this.

- **Damage to area identity** – This neighbourhood has developed a unique identity through regeneration: creative, diverse, well-maintained, and residentially strong. It is now one of Camden’s most attractive communities. This plan threatens to unravel that.

### **c) Not Effective**

The site is not deliverable:

- It’s too small, and its layout makes access and utility provision difficult;
- It removes one of the last green corners in the estate;
- It lacks privacy for future occupants and guarantees tension with surrounding residents.

Camden itself admits further feasibility work is needed. That’s not effective planning — that’s kicking the can down the road.

### **d) Not Consistent with National Policy**

National policy requires that Traveller sites be:

- Sustainable,
- Safe,
- Integrated, and
- Health-conscious.

Site c27 is none of these. It’s a patch of hardstanding and trees on a polluted, noisy roadside. Would Camden place social housing or a care home here? If the site wouldn’t meet normal housing standards, it shouldn’t be used for Traveller families either.

I strongly urge Camden Council to withdraw Site c27 from the Local Plan and undertake a transparent, evidence-led reassessment of site options that balances practicality, fairness, and community well-being.

Instead of forcing through an unsuitable Traveller and Gypsy site, I urge Camden to invest in something that truly benefits this community. This land has been neglected for years, despite sitting at the gateway to Chalk Farm and just steps from one of Camden’s busiest Tube stations. It’s time Camden stopped treating this site as an afterthought and started seeing it for what it is: a rare opportunity in a prime, high-value location. It should be used for something that enhances, not erodes, the area.

Whether that’s a green space, a pocket park, a community garden, or even a heritage or biodiversity project, the residents of Chalk Farm and the wider borough deserve better. Give this land back to the people who live here, or at least ask them what they would like to see here — and let it become a space that reflects the Camden we’re all trying to build.

Sincerely,  
Mark Perez Walton

Responder 25

Date: Wed, 18 Jun 2025 09:40:57 +0000

From: marcio souza

To: PlanningPolicy

Subject: Objection to Camden Local Plan – Proposed Submission Draft 2025  
Representation Form

---

please find attached letter of objection to current plan to eliminate public space and replace it with a Gipsy and Traveller accommodation.

Attached the file and the link to the google doc.

[REDACTED]

Thank you

Rads

[REDACTED]

# Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

## Part A – Submit only one copy of this

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Marcio"/>	<input type="text"/>
Last Name	<input type="text" value="Souza"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="REDACTED"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code*	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation: **Adelaide Road Tenants Association**

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input style="width: 80px;" type="text" value="x"/>	No	<input style="width: 80px;" type="text"/>
(2) Sound	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80px;" type="text" value="x"/>	No	<input style="width: 80px;" type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input style="width: 150px;" type="text" value="x"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input style="width: 150px;" type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 150px;" type="text"/>
(4) Consistent with national policy	<input style="width: 150px;" type="text" value="x"/>

\*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

### **Objection to Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)**

On behalf of the residents of [REDACTED] I object to the soundness of the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). We ask that this representation be considered as part of the Regulation 19 consultation and respectfully request that the Planning Inspector recommend the site's removal from the Local Plan on the grounds of unsoundness, as it fails the tests of justification, effectiveness, and consistency with national policy as set out in NPPF paragraph 35.

#### **1. Loss of Functional Amenity Space Used by Residents**

While not formally designated as open space or a play area, the site is actively used by local residents and children as informal play and communal space. This site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation.

Its redevelopment would reduce the quality and variety of local amenity provision, contrary to:

- NPPF Paragraphs 99-101;
- Camden Local Plan Policy A2(e);
- London Plan Policy S4;

This is reinforced by the case *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548, confirming that informal, community-used land requires policy-compliant justification before its loss.

#### **2. Overlooking and Harm to Privacy - Amenity Impact**

The site is immediately and heavily overlooked by the multi-storey residential blocks of Constable House and adjacent buildings. The resulting conditions would undermine privacy for both existing residents and potential site occupants.

This contravenes:

- Camden Planning Guidance on Amenity;
- PPTS (2023), para. 13(c);
- Article 8 of the ECHR.

Supported by *Moore v SSCLG* [2013] EWCA Civ 1194.

#### **3. Flood Risk - Inappropriate for Highly Vulnerable Use**

The site lies within a Local Flood Risk Zone. Traveller accommodation is considered a "highly vulnerable" use under Planning Practice Guidance.

Contrary to:

- NPPF Paragraph 167;

- PPTS para. 13(g).

See APP/B5480/A/11/2151483 (Romford) for precedent.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

---

The proposed allocation is unsound and the plan should be modified by removing it from the plan on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

**Privacy Notice**

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

<b>11. Signature:</b>		<b>Date:</b>	
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# Notes to accompany the Representation Form

## 1. Introduction

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## 2. Legal Compliance and Duty to Co-operate

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- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.


If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

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Responder 26

Date: Wed, 18 Jun 2025 10:57:26 +0000

From: Paul Chapple

To: PlanningPolicy

Subject: ALLOCATION OF LAND ADJACENT TO CONSTABLE HOUSE,  
ADELAIDE ROAD AS A GYPSY AND TRAVELLERS SITE (C27)

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**From:** [REDACTED]  
**To:** [PlanningPolicy](#)  
**Subject:** ALLOCATION OF LAND ADJACENT TO CONSTABLE HOUSE, ADELAIDE ROAD AS A GYPSY AND TRAVELLERS SITE (C27)  
**Date:** 18 June 2025 11:57:34

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You don't often get email from [REDACTED]

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Planning Department,

My name is Clementine Chapple [REDACTED]  
[REDACTED]

I wish to make objection/representation in respect of proposed site allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

The modification proposed is the deletion of site allocation C27: Land adjacent to Constable House, Adelaide Road

References:

Chapter 4 Central Camden: Table 5 – Further site allocations in Central Camden: C27 Land adjacent to Constable House, Adelaide Road, for Gypsy and Traveller accommodation

Chapter 7: Meeting Housing Needs: Policy H11 Accommodation for Travellers no.2.C27 – Land adjacent to Constable House, Adelaide Road

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations C27 Land to the East of Constable House

The following are my reasons for the proposed Modification:

1. Inappropriate Use of the Site

The site forms part of Constable House and currently forms part of the surrounding open space/amenity area for use by residents. The use of this site for Gypsies and Travellers will be a significant loss to the residents and others who currently enjoy this amenity land. Open space and amenity land is in very short supply in this dense residential area and its loss will be significant to local residents.

The site is highly visible in this densely populated residential location. Adelaide Road is a major car and bus route east to west between Swiss Cottage and Chalk Farm. The occupants of the site will have no privacy and will experience severe traffic noise. The proposed use will significantly increase the road usage at the junction of Adelaide Road and Eton College Road, which is already a dangerous junction for cyclists and pedestrians.

Constraints applied in the process of site identification and selection do not appear to have been

applied in the case of C27 -Land to the East of Constable House:

- A. Playground – It has historically been identified on the OS Map as a playground and kick about space.
- B. Flood Risk – Adelaide Road is identified as a surface water flood risk. In addition the site is at low level and subject to surface water flooding lying at the bottom of the downward slopes of Adelaide Road and Eton College Road. The site is accessed only down steps and is enclosed by a brick wall allowing no escape of surface water and likely to severely endanger occupants of the site.
- C. There is no separate independent access to the site. There is no vehicular access to the site only pedestrian access down steep steps. Any alterations to this will cause major disruption to local residents.
- D. Amenity space associated with housing estates – Such sites are generally considered by LB Camden to be unavailable and unsuitable, because the availability and access to Council housing and private open space of Council tenants is already constrained by the dense urban nature of the borough and high land values. (Ref Gypsy and Travellers Site Identification and Selection Report November 2024 – Para 2.23)
- E. Overlooking – The site is overlooked on all four sides by buildings over 4 storeys. To the east by the residents of 5 storey Constable House, to the north by the residents of Provost Road, to the west by the residents of Etons (6 storeys) and will be overlooked by the new residential block under construction at 5-17 Haverstock Hill (C25 in allocation schedule) and to the south by residents of Primrose House and Bridge House Adelaide Road. Passing buses on Adelaide Road will deny privacy for a Gypsy and Travellers site.
- F. The site is an important local green/open space with mature trees and wild flowers protected under the policies of the adopted and emerging local plan.

## 2. Lack of Consultation

There has been no consultation on the Allocation of Land to the East of Constable House (C27) as a Gypsy and Travellers site – generally or specifically with local residents/neighbours adjoining the site.

Summary Justification:

1. The two allocated sites were not identified until the publication of the Submission Draft Local Plan in May 2025
2. Policy H11 in the Draft Local Plan 2024 expressed an ‘intention’ to identify sites
3. Notice of a consultant’s report ( Gypsy and Travellers Site Identification Study (GTSIS) published in November 2024) was by Newsletter posted on the Council’s website on 24th December 2024 requiring responses by 29th January 2025. The GTSIS reported 18 sites were selected for Gypsy and Travellers – for further Council officer assessment – Land to the East of Constable House (C27) was not identified
4. Further assessment of the selected 18 sites by officers in a Topic Paper published in April 2025 still did not identify Land East of Constable House for a Gypsy and Travellers site
5. Not until this late stage of consultation on the Submission Draft Local Plan has it been possible to raise local concern on the matter.

For the reasons listed above the Camden Draft Plan should be modified by the deletion of C27 and the allocation of the site for Gypsy and Travellers.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Yours sincerely

Clementine Chapple

## Responder 27

Date: Wed, 18 Jun 2025 16:25:20 +0000

From: Elena Butterworth

To: PlanningPolicy

Subject: SRG Holborn Ltd Written Representation - Camden Local Plan Proposed Submission Draft 2025

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## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="n/a"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Elena"/>
Last Name	<input type="text"/>	<input type="text" value="Butterworth"/>
Job Title	<input type="text"/>	<input type="text" value=""/>
Organisation	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 1*	<input type="text"/>	<input type="text" value=""/>
Address Line 2	<input type="text"/>	<input type="text" value=""/>
Post Town*	<input type="text"/>	<input type="text" value=""/>
Post Code*	<input type="text"/>	<input type="text" value=""/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

**Part B – Please use a separate page for each representation**

Name or Organisation: <b>SRG Holborn Ltd</b>
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**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	<input type="text" value="n/a"/>	Policy	<input type="text" value="n/a"/>	Policies Map	<input type="text" value="n/a"/>
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input checked="" type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="checkbox"/>
(4) Consistent with national policy	<input checked="" type="checkbox"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

As per paragraph 23 of the NPPF (December 2024), “strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”.

Policy S1 (South Camden) in the Camden Local Plan Proposed Submission Draft 2025 states that “Development around Holborn has the potential to strengthen the area’s role as a location for business, supported by the enhanced access brought by the Elizabeth Line. It will create

*more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes".* This policy clearly highlights Holborn as being a focus for development within South Camden.

As part of the Sustainability Appraisal of the Proposed Submission Draft, which forms part of the evidence base, there is a legal requirement (NPPF Paragraph 33) to examine reasonable alternatives. Although the Site Allocation Topic Paper does assess sites suitability, SRG Holborn Ltd questions why Site 20: Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street, which had been a site allocation in the adopted Camden Local Plan (2017) has not been brought forward as a site allocation in the Proposed Submission Draft. The site is available for development and offers the potential to deliver a scheme in line with the vision for Holborn in the Proposed Submission Draft. Further, the Site is located within the Central London Activities Zone which is a nationally and internationally important centre of business. The Site has excellent transport connectivity and the southern section is within the CAZ retail cluster. All of the above demonstrating a strong case for the Site being suitable for allocation.

Although the site has planning permission for an office-led scheme, granted September 2019 (2018/4924/P), the permission has not been delivered. The Site is expected to come forward during the plan period and is not below the capacity threshold for inclusion. Therefore, the Site allocation should be added back into the Proposed Submission Draft. Appendix One provides the suggested amendments to Site 20 to incorporate.

The adopted Local Plan Site 20 has been updated and amended to reflect the current planning history and planning policy on the Site. In particular, the mix of uses has been extended to include hotel use, given the support for such uses under Policy S1 within Holborn and Policy IE5 which steers additional large scale visitor accommodation provision to areas of the Central Activities Zone, recognising that hotels and visitor accommodation can contribute to viability. It is considered that a hotel use on the Site would accord with Proposed Submission Draft Local Plan and provide the opportunity to deliver a mix of uses on the Site that can contribute to the vitality and viability of the Site and area, and ensure a deliverable scheme.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Please refer to Appendix One, submitted as part of this response form, which provides the details and amendments (in track changes) for Site 20 to be re-allocated in the Local Plan, along with updates since the current Local Plan was adopted.

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

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8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

See Covering Letter

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<b>11. Signature:</b>	<b>E.Butterworth</b>	<b>Date:</b>	<b>18.06.2025</b>
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## 1. Introduction

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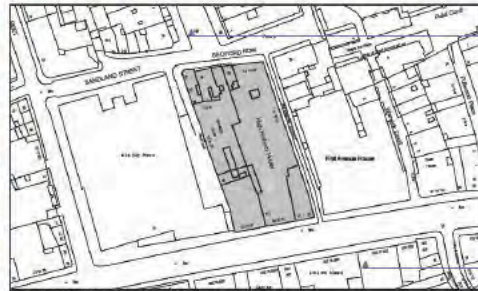
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## Site 20: Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street



© Crown copyright. All rights reserved (Licence No. 100019726) (Year: 2008)  
Scale 1cm : 30m

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### Site Details

Area: 3,700 sqm

Ownership: Private

Existing Use: Offices (Class E(c)), Shops (A+Class E(a)), ~~Financial and Professional Services (A2)~~, ~~Public House (Sui Generis)~~, ~~Restaurants and Cafes (A3)~~, ~~Drinking Establishment (A4)~~, and six Flats (Class C3).

Ward: Holborn and Covent Garden

### Planning Context

#### Planning Designations

~~Central London Area~~

~~Holborn Growth Area~~

Central Activities Zone (CAZ)

CAZ Retail Cluster (Southern part of the site along High Holborn)

Listed buildings: 46-48 Bedford Row, Grade II Listed

Conservation Area: Bloomsbury (includes buildings that make a positive contribution to the conservation area)

~~Central London Frontage (southern part of site)~~

Archaeological Priority Area: London Suburbs

Protected Vistas LVMF 2010 View 5A.2 (Greenwich Park Wolfe Statue to St Paul's Cathedral)

#### Other Information

Public transport accessibility level: excellent (6b)

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Relevant Planning Applications

<u>July 2020</u>	<u>46-48 Bedford Row: Granted for Demolition of existing rear extension and erection of a new rear extension to 46-47 Bedford Row with roof terrace above. Installation of air conditioning plant within lightwell of No. 48 and on terrace of 46-47 Bedford Row; internal and external refurbishment works to No.46-48 Bedford Row; associated landscaping and other ancillary works (2020/0686/P).</u>
<u>July 2020</u>	<u>46-48 Bedford Row: Granted for Demolition of existing rear extension and erection of a new rear extension to 46-47 Bedford Row with roof terrace above. Installation of air conditioning plant within lightwell of No. 48 and on terrace of 46-47 Bedford Row; internal and external refurbishment works to No.46-48 Bedford Row; associated landscaping and other ancillary works (2020/1335/L).</u>
<u>Sept 2019</u>	<u>18-23 Hand Court: Granted Subject to a Section 106 Legal Agreement for Demolition of 18 - 21 Hand Court and the erection of a new building comprising, basement, ground plus 4 upper storeys of office (Class B1) and retail/food and drink (Class A1/A3) uses; the refurbishment and change of use of basement and ground floor level at 22 - 23 Hand Court from office (Class B1) to retail/food and drink (Class A1/A3); and associated works (2018/4924/P).</u>
<u>Feb 2019</u>	<u>24-25 Hand Court: Granted for Change of use from a printers/copiers (A2) to a doctor's surgery (D1) (2018/5107/P).</u>
<u>Oct 2011</u>	<u>Wider Site: Permission granted subject to a s106 Legal Agreement (2010/5725/P) Revisions to planning permission 2009/0675/P, dated 07/07/2009 for mixed use redevelopment of the site involving the part demolition, part retention and part erection of new eight storey (plus two level basement and roof plant floor) building to accommodate A1, flexible A3/A4, B1, residential and student units. Revisions relate to variations in building envelope, office and retail space, including an overall reduction of office (Class B1) accommodation by 552sqm and overall increase of retail (Class A1) by 426sqm, as a result of reduction of floor to ceiling heights at ground and first floor levels and relocation of plant room to basement to create an eighth floor of office (Class B1) accommodation and various other internal reconfigurations and to create ground floor retail units on Hand Court (west) elevation; increase in parapet height at seventh and eighth floor levels on Brownlow Street (east) elevation by 1.1m, increase in height of mansard roof associated with High Holborn House on south elevation by 1m; alteration to location of service yard entrance (to the south) and kerb (to the west to widen the highway) on Brownlow Street, retention of Brownlow Street highway to High Holborn (as opposed to 2009/0675/P which pedestrianised part of Brownlow Street) and associated alterations.</u>
<u>Nov 2011</u>	<u>Application submitted for 'Renewal of planning permission granted on 07/07/2009 (ref. 2009/0675/P) for the mixed use redevelopment of the site involving the demolition of Caroline House, 18-22 Hand Court and parts of High Holborn House including the erection of a new eight storey (plus two level basement and roof plant floor) building to accommodate A1 (Retail) and flexible A3/A4 (Restaurant/Drinking Establishment) at ground floor level together with new B1 (Office) space. Conversion of 46-48 Bedford Row to create 3x single family dwellings, change of use and extension of existing B1 (office) space to form 15x residential units within, 45 Bedford Row and 49-51 Bedford Row; conversion and extension of Brownlow House to provide 10x residential units(affordable housing); Redevelopment of 23 Hand Court to provide 22 student units in place of 6x existing residential units; new servicing access from Brownlow Street, and various public realm works to Brownlow Street, Bedford Row and Hand Court' (ref. 2011/6030/P).</u>

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Nov 2010 Wider Site: Revisions to planning permission 2009/0675/P, dated 07/07/2009, (for mixed use redevelopment of the site involving the part demolition, part retention and part erection of new eight storey (plus two level basement and roof plant floor) building to accommodate A1, flexible A3/A4, B1, residential and student units), relating to variations in building envelope, office and retail space, including an overall reduction of office (Class B1) accommodation by 337sqm and overall increase of retail (Class A1) by 426sqm (2010/5725/P).

Feb 2009 Wider Site: Permission granted subject to a s106 Legal Agreement (2009/0675/P) Mixed use redevelopment of the site, including retail, restaurant, offices, 22 additional residential dwellings, student accommodation, and public realm improvements

July 2009 Wider Site: Demolition of 19-22 Hand Court and parts of High Holborn House and demolition behind retained facade of 23 Hand Court (2009/0677/C).

Nov 2008 46-48 Bedford Row: Granted for Demolition of rear additions and internal and external alterations in connection with conversion and restoration of 46-48 Bedford Row (2008/4964/L).

May 2001 23 Hand Court: Permission granted for Change of use of basement floor level from Use Class A3 (Restaurant) to Use Class B1 (Office) (PSX0104273).

Feb 1999 23 Hand Court: Application for Change of use from non-residential institution to use as 8 self-contained flats on part 1st, 2nd and 3rd floor levels together with the provision of a business use (class B1) on part 1st floor and food & drink use (Class A3) use on ground and basement levels, involving works of conversion, elevational changes, and a roof extension, as shown on drawing numbers 9903/L01, /201, /100x, /200x, /201, /200a, /101a and 100a (PS9904433) – refused..

Nov 2010 Revisions to planning permission 2009/0675/P, dated 07/07/2009, (for mixed use redevelopment of the site involving the part demolition, part retention and part erection of new eight storey (plus two level basement and roof plant floor) building to accommodate A1, flexible A3/A4, B1, residential and student units), relating to variations in building envelope, office and retail space, including an overall reduction of office (Class B1) accommodation by 337sqm and overall increase of retail (Class A1) by 426sqm (2010/5725/P).

Feb 2009 Permission granted subject to a s106 Legal Agreement (2009/0675/P) Mixed use redevelopment of the site, including retail, restaurant, offices, 22 additional residential dwellings, student accommodation, and public realm improvements.

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## Site allocation guidance

**Conversion and redevelopment to provide a mixed use scheme suitable to a Central London location including offices, hotel, other commercial uses and a contribution to the supply of self-contained (Class C3) housing ~~and community uses~~.**

Development will be expected to:

- Secure an appropriate mix of commercial uses.
- Concentrate residential uses towards the north of the site.
- Look to provide a range of flexible business floorspace for a range of business activities including small businesses.
- Provide active commercial uses (particularly retail) at ground floor level along High Holborn, reflecting its location within ~~a Central London Frontage~~ the CAZ Retail Cluster.
- Protect and enhance the fabric and setting of the existing Listed Buildings.
- Retain the existing buildings which make a positive contribution to the Conservation Area, unless their demolition can be justified and the character of the Conservation Area would be preserved and enhanced.
- Ensure that any new buildings or additions are compatible with the scale, grain and character of the site and surrounding area and do not detract from the appearance of the Conservation Area.
- Improve the public realm around the site and ensure any new buildings are designed to positively address adjoining streets including Hand Court and Brownlow Street through the provision of active frontages, particularly at ground floor level.
- Improve permeability of the area for pedestrians and cyclists.

### Site Context

The site comprises a range of buildings from different eras with a variety of built forms and uses. The majority of the site is currently used as office space, with ground floor retail units and residential units. The site is bounded by High Holborn to the south, Hand Court to the east, Brownlow Street to the west and Bedford Row to the north. ~~The proposed building is sited~~ site is located between the busy High Holborn to the south, which is dominated by retail and office space and the quieter, smaller scale Bedford Row to the north. It includes a seven storey 1960's office element facing onto High Holborn, with a row of four-storey 18th Century buildings sited along Bedford Row, which includes three Grade II listed buildings.

It offers potential for a combination of conversion and redevelopment works to make more efficient, effective and coherent use of the land whilst retaining those elements that contribute positively to the character and appearance of the Bloomsbury Conservation Area.

### Main Policy Considerations

A mix of uses should be provided on the site (Policy DS1P4), in particular given its CAZ location and being in a highly accessible location. This should include offices and other commercial uses to support Policies IE1, IE2, and IE4. Hotel use is also considered suitable on this site (Policy IE5) given the site's location in the Central Activities Zone and in an area which has a concentration of existing hotels and visitor accommodation. Self contained housing should also be provided (Policy H2).

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~~its Central London location (Policy CS0) and Holborn Opportunity area (Policy CS2). This should include the provision of a significant proportion of new permanent housing (Policies CS6) along with other mixed uses including retail, commercial or office floorspace (Policy DP12). The site is located in South Camden (Policy S1). Holborn, where the site is located, is considered to be a focus for development. Policy S1 (Part F) outlines development around Holborn having the potential to strengthen the area's role as a location for business, as well as creating more vibrant and better connected neighbourhoods in the heart of central London, with an improved commercial, leisure, cultural and retail offer, a high-quality public realm, and much-needed new self-contained homes (Policies H1 and H2).~~  
~~the Central London Area which is a highly accessible area identified in the Core Strategy as suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and uses that are likely to significantly increase the demand for travel (Policy CS3).~~

Camden will seek to manage the mix of uses at ground floor level (and promote retail uses) along High Holborn in order to support and protect the CAZ Retail Cluster (Policy S1).

~~promote the shopping and service character of the Holborn Central London Frontage (Policy CS7). Camden would also seek the provision of a range of flexible business workspace on the site (Policy CS8). The Council will ensure that development in these locations responds positively and sensitively to local context and character (Policy D1), and takes into account amenity (Policy A1) and community safety (Policy A2). Any development will be required to preserve the listed buildings on the site and the setting or nearby listed buildings to the west (Policies CS14 and DP25). Policy D5).~~

~~is of suitable scale and character for the area in which it is situated (Policies DP24 and DP25), and takes into account amenity and community safety (Policy CS5). Any development will be required to preserve the listed buildings on the site and the setting or nearby listed buildings to the west (Policies CS14 and DP25).~~

### Further Information

In addition to the listed buildings on Bedford Row, some of the existing buildings on the site have been identified as making a positive contribution to the Conservation Area, and there will be a presumption in favour of retaining those elements that make such a contribution. However, there is scope for internal works and the insertion of new development behind some of the existing facades to provide more modern accommodation and to increase the density of development and the efficiency of land use on the site. Such development will only be acceptable if the character of the Conservation Area is appropriately preserved or enhanced and the fabric and setting of the Listed Buildings is not unacceptably harmed.

There is also scope for development to extend beyond the envelope of the existing buildings in some areas. However, the varied building forms, scales and eras are part of the site's interest and this character should be respected in any redevelopment. A uniform design approach and/or unrelieved monolithic new buildings or additions should be avoided.

The site is in a high density urban area and consideration should be given to any potential impacts on the amenity of neighbouring premises.

~~Any significant increase in office or other commercial floorspace would be expected to be accompanied by an increase in housing provision on the site, including affordable housing.~~ Residential accommodation is likely to be best located towards the northern end of the site, away from the busy commercial spine of High Holborn and closer to the quieter environment around Bedford Row where buildings have a more domestic scale.

Active frontages are encouraged along the ~~Central London Frontage~~ CAZ Retail Cluster along High Holborn, and the long frontages to Brownlow Street and Hand Court would benefit from activity and interest at ground floor level, particularly along Brownlow Street which is currently characterised by a largely blank interface with the street. The relationship between commercial and residential uses both on the site and in the surrounding area will need to be sensitively handled.

A comprehensive redevelopment of the site will offer opportunities to improve the public realm and surrounding streets, as well as local way-finding and pedestrian connectivity, which should be maximised.

JHM/EB/DP6872  
18 June 2025

London Borough of Camden  
Planning Policy  
Camden Town Hall  
Judd Street  
London  
WC1H 8EQ

Sent by email to: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Sir / Madam,

## Representations to Camden Local Plan – Proposed Submission Draft 2025

These representations are submitted to the London Borough of Camden (LBC) on behalf of our client, SRG Holborn Ltd, in respect of the consultation on the Camden Local Plan – Proposed Submission Draft 2025 (herein referred to as “Proposed Submission Draft”).

DP9 Ltd have focused the representation on advocating for the Site to be allocated in the emerging Local Plan, as per the site allocation in the Adopted Camden Local Plan Site 20: Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street. We have not made representations on specific policies.

SRG Holborn Ltd, the owners of Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street (“the Site”) is committed to working collaboratively with LBC to inform the preparation of the Camden Local Plan – Proposed Submission Draft.

Alongside this covering letter the following have been submitted:

- Representation Form (as requested by LBC)
- Appendix One: Site 20 Site Allocation Suggested Amendments (in tracked changes) – to be read following review of the Representation Form.

### Background

SRG Holborn Limited is wholly owned by SRG Holding; a leading family-owned holding company in the UAE whose core business and expertise is real estate investments and development. For over six decades SRG has been providing commercial, hotel and residential properties to meet the needs of the booming city of Dubai. Through its diversified fully-owned subsidiaries SRG has extensive



operations across the entire real estate value chain, including project development, property management, facility management, sales & leasing, and hospitality management. Some of the city's most notable landmarks, located on prime real estate, such as Marina Heights, Burj Al Salam Towers, Sheraton Grand Hotel, Staybridge Suites Financial Center, Staybridge Suites Internet City, Marquise Square Tower, Upside Living, and SRG Tower are built and managed by SRG.

SRG's focus within the UAE is residential and hospitality, owning and operating over 4,500 homes and hotel suites with a similar number in the pipeline. SRG have also developed 500 offices. Since 1999, SRG has been investing substantially in the growth of its assets and operation in the UK real estate market and has an extensive portfolio of principally London-based property including 42, 44a, 46 Westbourne Grove; 202 Hammersmith Road; 20 & 20A Eden Street in Kingston Upon Thames, Surrey; Station House, 374-380 Streatham High Road; and, the latest 1.2 acre residential development at 5-29 Coombe Road, New Malden. SRG Holborn Limited acquired the properties noted in this representation letter, the high-profile "High Holborn Estate" from Blackstone in 2015.

### **The Site**

The Site is sustainably located for mixed-use development, given its Central London location, Public Transport Accessibility Level (PTAL): Excellent (6b) and the surrounding context, and would ultimately ensure the Site maximises its contribution towards LBC's identified development needs, particularly in Holborn, as well as having significant placemaking benefits.

SRG Holborn Ltd is actively working with ERP Architects (ERP) to bring forward development at Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row & Brownlow Street. ERP are currently working up a scheme to bringing forward to a pre-application meeting with LBC, and DP9 Ltd will be engaging imminently to set up a pre-application meeting alongside entering into a Planning Performance Agreement (PPA). The proposal offers the opportunity to deliver comprehensive redevelopment of the Site to meet many of the objectives of the Local Plan.

SRG Holborn Ltd support LBC's emphasis of Holborn being a focus for development within South Camden, and consider there is greater opportunity to strengthen the areas role within London. This includes re-adopting Site 20 (in the proposed revised form) into the Proposed Submission Draft.

Given SRG Holborn Ltd interest within Holborn, our client would wish to stay engaged with the Camden Local Plan – Proposed Submission Draft and reserve its position to make further representations and appear at any forthcoming public examination.

Should you require any further information or clarifications please do not hesitate to contact Elena Butterworth or Jonathan Marginson at this office.

Yours faithfully

**DP9 Ltd.**

## Responder 28

Date: Wed, 18 Jun 2025 20:22:41 +0000  
From: Debs Ellert  
To: PlanningPolicy  
Subject: Re: Camden Local Plan Proposed Submission Draft – Proposed Traveller Site near Chalk Farm Station - planning proposal C27

---

Camden Council  
Camden Town Hall  
Judd Street  
London [redacted postcode]  
[redacted email]

Dear Planning Policy Team,

I'm writing as a long standing local resident to express my concerns about the proposal to allocate land near Chalk Farm Station as a permanent Traveller site within the Camden Local Plan.

I fully understand and respect the need for Camden to meet its legal obligations and to provide appropriate sites for Traveller families. However, I feel strongly that this particular location is simply not the right place for such a site – neither for the Traveller families who might live here, nor for the existing local community.

—

### Safety and Suitability of the Site

The site itself is extremely small and tightly enclosed by the Northern Line on one side and busy main roads on the other. There is very limited safe outdoor space, and with heavy traffic and fast moving vehicles nearby, I worry greatly about the safety risks – especially for children who would be living close to these hazards on a daily basis.

Beyond this, I don't believe this area offers the kind of peaceful, secure, and healthy environment that any family should expect. The constant noise, pollution and congestion are already daily challenges for those of us who live here. Adding a residential site into this already pressured space would not only create new risks, but would also severely limit the quality of life for those living there.

—

### Concerns About Crime and Anti Social Behaviour

As a local resident, I see first hand that this part of Camden – being so close to the Market, Chalk Farm Station, and Camden Town – already experiences higher levels of street crime, pickpocketing, drug related activity, and anti social behaviour, especially in the evenings and on weekends.

The introduction of a permanent residential site at this location raises serious questions about how policing, community safety teams and local services would cope with any additional pressures. Camden's own experience with previous site proposals, such as at Frideswide Place in Kentish Town, has shown that worries about crime, anti social behaviour, littering and overstretched services were key reasons why those plans were ultimately withdrawn.

I fear similar challenges would inevitably arise here. Our police and public services are already stretched to manage existing needs; adding further strain without careful planning could have real consequences for both existing and new residents.

—

### Long Term Disruption and Unsuitability

On top of these immediate concerns, this site sits directly on the edge of the extensive HS2 construction zone near Euston. The disruption from years of ongoing work - noise, dust, traffic diversions and heavy vehicle movements - make this a very poor choice for a long-term family home. Camden has previously ruled out other sites that didn't face even half these difficulties.

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#### A Lack of Proper Engagement

One of the things that concerns me most is how little local consultation seems to have taken place. Many of us who live in this area only heard about this proposal late in the process, with very little opportunity to give meaningful input. This echoes what happened previously with sites like Frideswide Place and Bassett Street, where residents and local businesses raised serious concerns after feeling left out of proper discussions. In both cases, Camden eventually acknowledged these shortcomings and withdrew the proposals.

The same issues are repeating themselves here. Camden has a duty not just to identify sites but to involve and listen to the people who live and work in the areas affected.

---

#### My Request to Camden

I want to be very clear: my objection is not about opposing the principle of providing Traveller accommodation. I fully support Camden's responsibility to find suitable, respectful, and safe sites for Traveller families. But this location, squeezed into a heavily trafficked part of the borough, with significant safety risks, long-term disruption, existing crime challenges, and already overstretched services, is not the right solution.

I respectfully ask that Camden:

- 

Withdraw this site from the Local Plan;

- 

Reassess site options based on clear safety, space, service capacity, and suitability criteria;

- 

And carry out meaningful consultation with both local residents and Traveller communities before any final decisions are made.

Thank you for taking the time to consider my concerns. I trust the council will listen carefully to local voices and take the opportunity to find a more appropriate and sustainable solution.

Yours sincerely,

Deborah Ellert

[redacted address]



## Responder 29

Date: Thu, 19 Jun 2025 10:15:47 +0000

From: Amy McKeown

To: PlanningPolicy

Subject: Please find attached a response to the consultation on Site Allocation C27

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[Do Workplace Health Right](#) | [e-learning](#) | [Speaking](#) | [Mentorship](#)

## Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

**E-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Post to:** Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Miss"/>	<input type="text"/>
First Name	<input type="text" value="Amy"/>	<input type="text"/>
Last Name	<input type="text" value="McKeown"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value=""/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value=""/>	<input type="text"/>
Post Code*	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation:

**3.** Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph  Policy  Policies Map

**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input style="width: 80%; height: 20px;" type="text" value="No"/>
(2) Sound	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input style="width: 80%; height: 20px;" type="text" value="No"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input style="width: 80%; height: 20px;" type="text" value="No"/>

\*See guidance note at the end of the form for assistance with completing this section.

**If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6**

**5.** Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input style="width: 90%; height: 25px;" type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input style="width: 90%; height: 25px;" type="text" value="No"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 90%; height: 25px;" type="text" value="No"/>
(4) Consistent with national policy	<input style="width: 90%; height: 25px;" type="text"/>

\*See guidance note at the end of the form for assistance with completing this section.

**6.** Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

**It is totally unsound as per Site Allocation C27.**

I recognise and support the fact that Camden Council legally needs to provide space for this disadvantaged community, but this is the wrong place. The context is that private consultants were brought in by the council to find sites across Camden but after a lot of Nimbyism elsewhere this was one of the two sites chose. <https://www.camdennewjournal.co.uk/article/camden-brings-in-consultants-to-scour-borough-for-new-traveller-sites-but-hits-opposition-in-kentish-town>

- It is in a **highly built up area** - next to Constable House and all the Eton Villas - and very exposed for the people who will live there.

- It is very small and the Travellers community will be split – something they have said they don't want
- It is next to a main road, a railway and on an ambulance run - again a poor choice for the travellers to be situated there
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works
- There is high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it
- it will be highly visible
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan
- It will have knock on impact to the local community and Primrose Hill, including policing and the SNP

The Travelling community themselves are not bought into this and fear losing their current accommodations as a result - <https://www.camdencitizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites/>

It is a poor choice

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

This is a highly impractical solution that has not been consulted on properly. The Council needs to undertake a full and through consultation about use of the site.

(Continue on a separate sheet if necessary)

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Possibly – with regards Site Allocation C27

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

**Privacy Notice**

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

**Please note that comments submitted to the Council cannot be treated as confidential.** All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

<b>11. Signature:</b>	<b>Amy McKeown</b>	<b>Date:</b>	<b>19 June 2025</b>
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# Notes to accompany the Representation Form

## 1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

## 2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

## 3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

#### **4. General advice**

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Date: Fri, 20 Jun 2025 06:25:51 +0000

From: Talat Khan

To: PlanningPolicy

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

---

Name: Talat Khan

[REDACTED]

[REDACTED]

Email address: [\[redacted email\]](#)

#### OUTLINE OF OBJECTION/REPRESENTATION

##### **Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

#### REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers**: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .
- **Playground**: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking**: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the

proposals.

**Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector

Talat Khan

Responder 31

Date: Fri, 20 Jun 2025 09:22:03 +0000  
From: pamela shiffer  
To: PlanningPolicy  
Subject: Travellers/Gypsy site near Chalk Farm

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Yours sincerely,  
Pamela Shiffer.

PAMELASHIFFER

Date: Fri, 20 Jun 2025 10:20:00 +0000

To: PlanningPolicy

Subject: Camden Local Plan: objections to site C27 – Playground of Constable House, Adelaide Road (Gypsy & Traveller site)

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Subject: Camden Local Plan: objections to site C27 - Playground area of Constable House, Adelaide Road (Gypsy & Traveller site)

#### PERSONAL DETAILS

Name: Rob Kirkwood

Address: [redacted address], London [redacted postcode]

Telephone number: [redacted]

Email address: [redacted email]

#### OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: playground adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

#### REASONS

- Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location
- Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block

under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- Flood Risk -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place, which already suffers from serious congestion exacerbated by the electric bike / scooter station established there which is frequently in disarray with bikes and scooters all over the road.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools, nor for that matter GP surgeries etc. The area is very densely populated already without adding this site.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site . The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of play space (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

#### Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector

Regards  
Rob Kirkwood

## Responder 33

Date: Fri, 20 Jun 2025 10:23:36 +0000

From: carol isaacs

To: PlanningPolicy

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

---

Regarding the modification proposed delete site allocation C27: land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Respectfully requesting that Site C27 should be deleted from the following:

- 1) Chapter 4 Central Camden: Table 5
- 2) Chapter 7: Meeting Housing Needs: Policy H11
- 3) Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

For the following reasons:

- 1) **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area particularly in such a dense urban location.
- 2) **It is also an important Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi Trees project involving KOKO Foundation, Think & Do and Camden Council. Apart from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi Trees planting. It would also involve the removal of substantial numbers of mature holly trees between 30 and 60 depending on the exact site.
- 3) **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- 4) **Overlooking:** the site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5 [redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- 5) **Flood Risk:** the site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- 6) **Independent access:** there is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- 7) **Schools:** there appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site. The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Furthermore, there has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals. I only found out through our residents' association. To conclude, for the reasons listed above, the Camden Draft Plan should be modified by the deletion of site C27.

Thank you for your time and consideration.

Carol Isaacs



Date: Fri, 20 Jun 2025 10:28:40 +0000  
From: Jeremy Flax  
To: PlanningPolicy  
Subject: Objections to site C27 – Land East of Constable House, Adelaide Road  
(Gypsy & Traveller site)

## OUTLINE OF OBJECTION/REPRESENTATION

### Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

**Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

## Responder 35

Date: Fri, 20 Jun 2025 11:18:06 +0000

From: Soroush Kordestani

To: PlanningPolicy

Subject: Objection to proposed plan for area for travelers Chalk Farm

---

I object to proposed plan for area for travellers in Adelaide Road/Eton College Road.

While I support Camden's efforts to provide space for this disadvantaged community, the selection of this site is wrong for a number of reasons.

- It is in an already crowded area next to Constable House and Eton Villas, and would be overlooked by buildings of more than [redacted address] and the new development next to Chalk Farm tube station.
- It is very small (and actually smaller than the minimum size that Camden themselves recommend).
- It is next to a main road, a railway and an ambulance run - making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lack privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community and Primrose Hill, including the policing of these areas.
- The Traveller community don't like it and fear losing their current accommodations as a result

Regards

Soroush Kordestani

[Yahoo Mail: Search, organise, conquer](#)

## Responder 36

Date: Fri, 20 Jun 2025 11:43:39 +0000

From: adrian cahill

To: PlanningPolicy

Subject: Site ref Central Camden C27 - Traveller Site next to Constable House on Eton College Road

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Site ref Central Camden C27 - Traveller Site next to Constable House on Eton College Road  
**Date:** 20 June 2025 12:43:55

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While I support Camden's efforts to provide space for this disadvantaged community, the selection of this site is wrong for a number of reasons:

- It is in an already crowded area next to Constable House and Eton Villas, and would be overlooked by buildings of more than 4 storeys in Eton Place and the new development next to Chalk Farm tube station.
- It is very small (and actually smaller than the minimum size that Camden themselves recommend).
- It is next to a main road, a railway and an ambulance run – making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lack privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community and Primrose Hill, including the policing of these areas.

I therefore object to this proposal for the above reasons.

Adrian Cahill

[REDACTED]  
[REDACTED]  
[REDACTED]

## Responder 37

Date: Fri, 20 Jun 2025 11:45:54 +0000

From: Beverley Churchill

To: PlanningPolicy

Subject: Objection to Camden Local Plan Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:**  
**Subject:** Objection to Camden Local Plan Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)  
**Date:** 20 June 2025 12:51:18

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**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

To the Planning Policy Team, Camden Council

I am writing to express my strong objection to the proposed allocation of Site C27, land east of Constable House and adjacent to Adelaide Road, for Gypsy and Traveller accommodation within the Camden Local Plan. [REDACTED] residing close to the proposed site.

I was recently made aware of the proposal through a local neighbourhood chat group and have not received any direct notification or invitation to participate in consultations from Camden Council regarding this matter. This lack of communication is concerning and demonstrates a failure to properly engage with the local community.

My objections to the allocation of Site C27 are based on the following key concerns in no particular order:

- 1. Loss of Amenity & Open Space:** The proposed site currently functions as an essential open space and amenity area for residents of Constable House and the surrounding community. Its allocation for accommodation would result in a significant reduction in recreational space, diminishing the quality of life for residents, particularly in our densely populated urban area. This is a vital area for the enjoyment of the building's residents and contributes significantly to the wellbeing of residents in the neighbourhood.
- 2. Ecological Impact & Loss of Green Space:** The site has been the subject of recent community-led greening initiatives, including the Communi-Trees project, which involved the planting of fruit trees and wildflowers. This project, supported by organisations like the KOKO Foundation and Camden Council, provides not only valuable green space but also educational opportunities for young people in the community. Allocating the site for accommodation would necessitate the removal of these recent plantings and a substantial number of established mature holly trees, undermining Camden's stated commitment to enhancing greening and biodiversity.
- 3. Overlooking & Privacy Concerns:** The site is subject to significant overlooking from neighbouring residences, including Constable House, Provost Road, the Etons, and properties on Haverstock Hill and Adelaide Road. The introduction of accommodation on this site would further exacerbate privacy concerns and create potential conflicts between residents.
- 4. Flood Risk:** I am concerned that the proposed site lies within a flood risk zone, which is contrary to government policy.

5. **Inadequate Access:** I would like to object that there is no independent access to the site.
6. **Lack of Community Consultation:** As a local resident, I am deeply disappointed by the lack of consultation with the local community regarding the proposed allocation of Site C27. The Council has failed to adequately engage with residents who will be most directly affected by this proposal.
7. **Sustainability:** The project fails to provide sustainability.

I urge Camden Council to reconsider the allocation of Site C27 for Gypsy and Traveller accommodation and instead explore alternative locations that do not compromise the amenity, green space, and quality of life for existing residents. I ask Camden to properly take my concerns into account before progressing with this proposal which is detrimental to my neighbourhood, home, community and lifestyle.

I am committed to working with Camden Council to find a solution that meets the needs of all members of our community while preserving the unique character and quality of life in our very special area. I also wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

I respectfully request that my objection be carefully considered and that I be kept informed of any further developments regarding this proposal.

Sincerely,

Beverley Curtis

[Redacted signature]

**Beverley Churchill**  
CEO

**Churchill & Partners Limited**

[Redacted contact information]

<https://churchillandpartners.london/>

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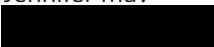


Responder 38

Date: Fri, 20 Jun 2025 11:57:53 +0000  
From: Jennifer May  
To: PlanningPolicy  
Subject: ARTA site allocation

---

Thanks  
Jennifer May



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** ARTA site allocation  
**Date:** 20 June 2025 12:58:13

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## ARTA Objection to Site Allocation C27

### RE: Formal Objection to Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

Dear Planning Policy Team,

We write on behalf of the Adelaide Road Tenants Association (ARTA) to formally object to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). We ask that this representation be considered as part of the Regulation 19 consultation and respectfully request that the Planning Inspector recommend the site's removal from the Local Plan on the grounds of unsoundness, as it fails the tests of justification, effectiveness, and consistency with national policy as set out in NPPF paragraph 35.

#### 1. Loss of Functional Amenity Space Used by Residents

While not formally designated as open space or a play area, the site is actively used by local residents and children as informal play and communal space. Although other garden areas exist across the estate, this site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation.

Its redevelopment would reduce the quality and variety of local amenity provision, contrary to:

- NPPF Paragraphs 99-101;
- Camden Local Plan Policy A2(e);
- London Plan Policy S4;

This is reinforced by the case *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548, confirming that informal, community-used land requires policy-compliant justification before its loss.

#### 2. Overlooking and Harm to Privacy - Amenity Impact

The site is immediately and heavily overlooked by the multi-storey residential blocks of

Constable House and adjacent buildings. The resulting conditions would undermine privacy for both existing residents and potential site occupants.

This contravenes:

- Camden Planning Guidance on Amenity;
- PPTS (2023), para. 13(c);
- Article 8 of the ECHR.

Supported by Moore v SSCLG [2013] EWCA Civ 1194.

### **3. Flood Risk - Inappropriate for Highly Vulnerable Use**

The site lies within a Local Flood Risk Zone. Traveller accommodation is considered a "highly vulnerable" use under Planning Practice Guidance.

Contrary to:

- NPPF Paragraph 167;
- PPTS para. 13(g).

See APP/B5480/A/11/2151483 (Romford) for precedent.

### **4. Access and Deliverability - Physical and Functional Constraints**

There is no independent vehicular access. Estate roads cannot accommodate trailers, service, or emergency vehicles.

Conflicts with:

- PPTS para. 13(b);
- Manual for Streets (DfT, 2007);
- Equality Act 2010.

### **5. Conclusion and Recommendation**

The proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk;
- Lack of deliverability.

We ask that a more appropriate, sustainable, and inclusive solution be found in consultation with all affected communities.

Yours faithfully,

Adelaide Road Tenants Association (ARTA)

Thanks

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Permanent Travellers Site Constable House  
**Date:** 20 June 2025 13:15:26

---

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**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Sir or Madam

??

As a local resident we would like to protest most strongly to the proposal to establish a Permanent Traveller???'s Site at Constable House, Chalk Farm.

??

The site is totally unsuitable as it is small on the middle of a residential area and it does not have any facilities to service an encampment.??

??

I cannot think of a more unsuitable site.?? Please re-consider .

??

Vivian and Judy Ward

Responder 40 and 171

Date: Fri, 20 Jun 2025 13:21:58 +0000

From: maria clara martins

To: PlanningPolicy

Subject: objection of site C27 – Land East of Constable House, Adelaide Road  
(Gypsy & Traveller site)

---

I am attaching my letter opposing the site C27 Land East of Constable House, Adelaide Road  
(Gypsy & Traveller site). Please confirm this has been received.

All the best,

Maria Clara



young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .

- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

## **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

***[I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.]***

*[Note: if you indicate here that you wish to be heard, you can always change your mind later! We will probably be encouraged to do this jointly]*

## Responder 41

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)  
**Date:** 20 June 2025 15:27:55

You don't often get email from [REDACTED]. [Learn why this is important](#)

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

### PERSONAL DETAILS

Name: Nicholas Smith

[REDACTED]  
[REDACTED]  
[REDACTED]

### OUTLINE OF OBJECTION/REPRESENTATION

**Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:  
Chapter 4 Central Camden: Table 5  
Chapter 7: Meeting Housing Needs: Policy H11  
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

### REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
  - It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
  - **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
  - **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6

storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

#### **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

***I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.***

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)  
**Date:** 20 June 2025 15:28:03

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## PERSONAL DETAILS

Name: Juliet Simmonds

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

## OUTLINE OF OBJECTION/REPRESENTATION

### **Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.

**The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.**

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

### **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Sent from my iPhone

## Responder 43

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Gypsy traveler site  
**Date:** 20 June 2025 15:33:33

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**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

We object to locating this Gypsy / Traveller site near Eton Place.

Mark Geller  
Florentina Geller

[REDACTED]

Date: Fri, 20 Jun 2025 14:51:49 +0000  
From: Koutrakos, Panos  
To: PlanningPolicy  
Subject: : Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

---

## PERSONAL DETAILS

Name: Panagiotis Koutrakos

[redacted] [redacted postcode]

Telephone number:

Email address: [redacted email]

## OUTLINE OF OBJECTION/REPRESENTATION

### **Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## REASONS

· :

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now

serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

## **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Responder 45

Date: Fri, 20 Jun 2025 15:01:03 +0000  
From: David and Marina Jones  
To: PlanningPolicy  
Subject: Fw: Re proposed Gypsy and traveller site next to Constable House Eton College Road NW3

---

For the attention of Manager in charge

Dear Sir or Madam

To save repetition , I am forwarding a copy of email sent to Deputy CEO; Amanda Grant .I feel one has to go to the top and let him or her know what is going on down the line .NO thought to us residents ,  
Who on earth could even suggest such a thoughtless and crazy idea,?

Obviously somebody with NO thought!!

We ALL appose this very worrying and THOUGHTLESS idea!!

Why not build, preferably out of London or at least well out on outskirts?

[REDACTED]

[REDACTED]

Dr David and Marina Jones [REDACTED] [redacted postcode]

----- Forwarded message -----

**From:** David and Marina Jones <[redacted email]>  
**To:** [redacted email] <[redacted email]>  
**Sent:** Friday, 20 June 2025 at 15:10:41 BST  
**Subject:** Re proposed Gypsy and traveller site next to Constable House Eton College Road NW3

Dear Amanda

I understand you are the Deputy C.E.O. of Camden Council and am writing to you with great concern re the above proposal.!!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],

[REDACTED]

Yours sincerely

Dr David and Marina Jones [redacted address] [redacted]

Email address as above

[redacted],

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:**  
**Subject:** Developments Near Constable House  
**Date:** 20 June 2025 16:05:08

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**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

**Dear Sirs,**

## **OUTLINE OF OBJECTION/REPRESENTATION**

### **Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## **REASONS**

• :

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
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of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
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- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
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**The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.**

**Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

## **Conclusion**

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27

Yours faithfully,

Simone Goligorsky, [REDACTED]

[REDACTED]

And

Sophie Goligorsky,

[REDACTED]